

**FINAL
ENVIRONMENTAL IMPACT REPORT
SCRIPPS MEMORIAL HOSPITAL
EXPANSION PROJECT
(EIR 90-07)
SCH #90010569**

**Prepared for
CITY OF CHULA VISTA
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1.0 INTRODUCTION

1.1 INTRODUCTION

This Recirculated Draft Environmental Impact Report (EIR) provides a detailed review and analysis of the potential environmental impacts associated with implementation of the proposed Scripps Memorial Hospital expansion project. The applicant proposes to expand the existing 4.7-acre hospital site onto an additional 8.9 acres contiguous with, and directly west, of the existing hospital for a total project site acreage of 13.6 acres. The existing hospital facility consists of a one and four story building containing approximately 74,000 square feet and 159 patient beds. The proposed project, implemented in phases, would ultimately expand the hospital facility to 446,344 square feet and 258 patient beds, add approximately 775 additional parking spaces in a 5 level parking structure, and approximately 124,500 square feet of medical office space in a building ranging from 4 to 6 stories on-site. Discretionary actions required for project approval include:

- A Conditional Use Permit (CUP) for the hospital master plan;
- Design Review of the hospital master plan and building design;
- A Special Permit due to location of a portion of the project site within a City redevelopment area;
- An Owner Participation Agreement with the Redevelopment Agency.
- Acquisition of real property, including the possible use of Redevelopment Agency condemnation powers;
- A loan agreement with the Redevelopment Agency; and
- A lease guarantee agreement with the Redevelopment Agency.

This EIR is informational in nature and is intended for use by the City of Chula Vista and the public in the review and consideration of this proposed project. The following alternatives to the Scripps Memorial Hospital expansion project are also analyzed in this document:

- No Project
- No G Street Access
- H Street Business Coalition Alternative
- Retail and Entertainment Alternative
- Reduced Intensity Alternative
- Alternative Sites Analysis

The EIR has been prepared in accordance with the requirements of the City of Chula Vista Environmental Review Procedures and complies with all criteria, standards and procedures of the California Environmental Quality Act of 1970 (PRC 21000 et.seq.) and State EIR Guidelines (14 Cal. Code Regs. et.seq.)

This report has been prepared by the Environmental Services Group of Dudek & Associates, San Diego in cooperation with the Environmental Review Coordinator of the City of Chula Vista. The scope of the analysis was determined by the City of Chula Vista and by responses to a Notice of Preparation (NOP) distributed by the City in April, 1990. Seven letters were received in response to the Notice of Preparation including responses from: Caltrans, Sweetwater Union High School District, Chula Vista City School District, Sweetwater Authority, the law firm, Lillick and McHose, representing RTM Inc., owner of the Arby's restaurant, currently located on the project site and the law firm of Asaro & Keagy, representing First Interstate Bank. The NOP and responses are included in full in Appendix A of this document. Responses to comments received during the NOP period are incorporated in the text of the EIR at the appropriate locations. Letters were also received in response to initial study notices from the Sweetwater Authority, Sweetwater Union High School District, Chula Vista Elementary School District and Llewelyn Lieber, a private citizen. In accordance with the scoping process carried out by the City of Chula Vista, this EIR addresses environmental issues, as determined by the Environmental Review Coordinator, which could involve significant environmental impacts either individually or cumulatively. The following environmental issues are addressed in this EIR: Land Use/Community Character, Visual Quality, Traffic and Parking, Noise, Health, Air Quality, Geology, Water Conservation and Public Facilities/Services. Additionally, a summary

of an economic analysis prepared for the project including the alternatives is provided at the end of the document for reference only. This report is included in its entirety in the Appendices as Appendix G.

This recirculated Draft EIR responds to the various concerns raised by commentators on the prior draft EIR (dated March 1991). Readers are advised that if they feel that any points raised in their earlier comments on the prior draft are not adequately addressed in this Recirculated Draft EIR, they must submit these points in a new comment letter before the end of the public comment period. This Recirculated Draft EIR supercedes all previous drafts.

1.2 SUMMARY OF IMPACTS

The following Summary of Impacts provides a brief synopsis of impacts under each environmental topic, measures/actions to mitigate or reduce the impact, and whether the impact can be mitigated to a level below significance. This summary is intended for the reader to understand at a general level the environmental consequences of the project and the underlying conclusions reached in the EIR text. Section 4.0, Environmental Analysis, presents each topic's analysis in detail.

1) Land Use/Community Character

Impact:

The proposed project is consistent with existing land use designations and with redevelopment plans for the project site. The project provides for infill development within the Urban Core of central Chula Vista, consistent with one of the environmental goals of the City's Land Use Element of the General Plan. Loss of commercial uses on the site would not significantly affect the existing community character due to the location of similar commercial uses within one mile of the project site. Land use/community character impacts are not deemed to be significant.

It has been noted that comments received during the previous public review suggested that displacement of commercial businesses from the project site would, in itself, be a significant adverse and unmitigable impact, however, it has been concluded that displacement of these uses would not produce significant impacts due to the location of similar uses in the project area.

Mitigation Summary:

No mitigation is necessary

Impact Significance After Mitigation:

No significant adverse land use/community character impacts are identified.

2) Visual Quality

Impact:

Development of the western portion of the site currently developed with single level commercial buildings, with a multi-level medical office building fronting H Street, will permanently alter the visual character of the site. The bulk and scale of the proposed medical office building on the corner of H Street and Fifth Avenue would be more massive than current structures along H Street. In addition, development of a 5-story parking structure along G Street would result in a different visual character along the roadway than currently exists.

Mitigation Summary:

The following measures have been incorporated into the project design to partially mitigate visual impacts.

- All structures will be within the 100-foot height limit established by the City of Chula Vista for the Town Centre II Redevelopment Area;
- The medical office building at the corner of H Street and Fifth Avenue will range from 4-6 stories in height with the 4-story element located along the roadways and the larger,

6-story element set back a minimum of 100-feet from Fifth Avenue and H Street to reduce the apparent bulk and scale of the structure. The 4-story building element will be set back a minimum of 25 feet from Fifth Avenue and 45 feet from H Street.

- New hospital structures will be limited to 3 stories in height and, in general, will be set back a minimum of 180 feet from H Street. An exception is a 3-story administration building which would be constructed on the site of the existing hospital building during the ultimate phase of development. The administration building will be set back 48 feet from H Street.
- The parking structure along Fifth Avenue will be set back a minimum of 25 feet from the roadway. Architectural elements have been incorporated in the design of the parking structure to reduce the apparent scale of the facility.
- All project plans shall be subject to review and approval by the City's Design Review Committee (DRC). The DRC reviews projects for consistency with the overall urban design goals of the Chula Vista General Plan and relevant Area Plans.

Impact Significance After Mitigation:

Potential impacts will be partially mitigated with implementation of the proposed mitigation measures. However, visual impacts associated with the project would remain significant.

3) Traffic

Impact:

The proposed project would generate 4,980 ADT under Phase I and a total of 9,015 ADT under cumulative Phases I and Ultimate adding 1,201 ADT's to the existing trips already on the street network. Cumulative traffic levels at buildout will result in levels of service (LOS) C with the exception of the H Street/Fourth Avenue intersection which is projected to operate at LOS D during the PM peak hour.

Mitigation Summary:

The project is required to construct an additional westbound lane on H Street along the project frontage with implementation of Phase I and extended to Fourth Avenue with the Ultimate Phase as well as constructing a northbound acceleration/deceleration lane along Fifth Avenue along the project frontage. A median is also required on H Street between Fourth and Fifth Avenue during Phase I. The project shall also pay traffic signal fees to the City of Chula Vista for upgrading of traffic signals within the western portion of Chula Vista resulting from increasing traffic volumes.

Impact of Significance After Mitigation:

The project's contribution to significant cumulative traffic impacts will be mitigated to a level below significance by implementation of the recommended mitigation measures.

4) Noise**Impact:**

Traffic noise associated with project-generated trips on adjacent roadways and within the proposed parking structure would not adversely affect nearby sensitive receptors, such as residential uses and the junior high school, and no significant adverse impacts are anticipated. In the absence of future assessment and monitoring, proposed HVAC and standby power equipment could generate noise in excess of State standards.

Mitigation Summary:

Proposed HVAC and standby power equipment will be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The planned enclosure for the standby power unit will provide the necessary noise reduction depending upon the details of construction.

Impact Significance After Mitigation:

Potential impacts will be mitigated to a level below significance by implementation of the proposed mitigation.

5) Health

Impact:

Additional infectious waste would be produced with the expansion of the hospital. A UST removal plan will be prepared to address potential impacts associated with waste and storage tank removal on the site. The plan will include contingency measures in case leakage has occurred. Existing structures on site would be demolished with implementation of the project. An environmental audit would be prepared to assess the potential for asbestos being present within the structures on-site. If asbestos is found on-site, it would be removed prior to demolition of the structures.

Mitigation Summary:

Scripps Memorial Hospitals, including the Chula Vista Hospital, has an established infectious waste control program. A copy of the program is included as Appendix E to this document. Upon approval by the County Hazardous Materials Management Division, the infectious waste control program for the Chula Vista Hospital will be updated to reflect the approved hospital design and any changes to the hospital's infectious waste disposal schedule. A UST removal plan will be prepared to address removal of the waste and storage tanks from the site. The plan will include contingency measures in case leakage has occurred. An environmental audit will be performed to assess the potential for asbestos being found in the structures on-site that would be demolished with project implementation. If asbestos is found on-site, a certified removal service will remove the asbestos prior to structure demolition.

Impact Significance After Mitigation:

Potential impacts will be mitigated to a level below significance by implementation of the proposed mitigation.

6) Air Quality

Impact:

The proposed project represents infill development in an existing urban area and is consistent with the range of uses and densities anticipated for the site in the Chula Vista General Plan, the Central Chula Vista Area Plan and the Town Centre II Redevelopment Plan. Land uses assumed in these adopted Chula Vista plans have been incorporated into regional air quality plans and strategies. As described in Section 4.3, Traffic and Parking, at buildout, the project would generate approximately 1,500 more trips than anticipated in the General Plan travel forecast. Emissions generated by these trips would contribute an increment to the region's continued inability to meet ozone standards. Due to the relatively low number of trips, the absence of congestion, and the fact that the project represents infill development with concomitantly fewer trips than would occur if the project were developed in a more outlying area, this contribution is not regarded as significant.

Project implementation would result in increased traffic on area roadways, particularly H Street, G Street, Fourth Avenue and Fifth Avenue. Congestion can sometimes result in build-up of CO concentrations due to idling vehicles. According to the traffic analysis, however, all roadway segments and intersections would operate at Level of Service (LOS) C or better with the exception of the H Street/Fourth Avenue intersection which would operate at LOS D during the PM peak hour. The City of Chula Vista has adopted threshold standards which establish an LOS C standard for City streets; LOS D is acceptable at one AM and one PM peak hour. The project would comply with the City's threshold standard with respect to traffic congestion. Adverse air quality impacts due to traffic congestion are not significant. Short-term air quality impacts are anticipated during the grading and construction phases of the project. Construction phase impacts are not considered to be significant due to their temporary impact. With implementation of standard dust control measures during grading and construction phases, no air quality impacts are anticipated.

Mitigation Summary:

No mitigation is necessary for traffic related air quality impacts. However, implementation of standard dust control measures would be necessary to mitigate short-term air quality impacts associated with construction and grading on-site.

Impact Significance After Mitigation:

No significant adverse air quality impacts are identified.

7) Geology**Impact:**

Based on results of the geotechnical report prepared for the site, the project site would be suitable for future construction. Primary concerns for construction on the site include: 1) the presence of potentially expansive soils in a potentially seismically active area; 2) the presence of existing fill soils; 3) possible presence of foundation remnants, underground utilities, or other subsurface complexities related to previous site usage; and 4) proximity to the Chula Vista Fault.

Mitigation Summary:

The following mitigation measures have been developed to reduce impacts associated with seismicity and soil conditions on-site with the proposed construction of the hospital expansion, medical office building and parking structure. This list includes the full set of the measures recommended. The entire geotechnical report is included as an appendix to this document (Appendix F).

A. Earthwork

1. Clearing and Stripping

The site should be cleared of all obstructions including the existing buildings, pavements, underground utilities, and any miscellaneous trash or debris that may be present at the time of construction. After clearing, the ground surface should be stripped of surface vegetation as well as associated root systems. Holes resulting from the removal of buried obstructions that extend below the proposed finished site grades should be cleared and backfilled with suitable material compacted to the requirements given under "Compaction." Prior to any filling operations, the cleared and stripped materials should be disposed of off-site.

2. Treatment of Existing Fills and Soft Topsoils

The basement excavation will partially remove the existing fill and soft topsoil within the building limits. In order to provide suitable foundation support for the building and other proposed improvements outside the limits of the basement excavation, all existing fill and soft topsoils that remain after the necessary site excavations have been made shall be removed and recompacted. The recompaction work should consist of a) removing all existing fill and soft topsoil down to firm natural ground, b) scarifying, moisture conditioning, and compacting the exposed natural subgrade soils, and c) replacing the fill material as compacted structural fill. The areal extent and depth required to remove the fills should be determined by our representative during the excavation work based on his ~~an~~ examination of the soils being exposed. Any unsuitable materials (such as oversize rubble and/or organic matter) should be selectively removed and disposed of off-site.

3. Excavation

Based on the results of the exploratory borings the required site excavations can be accomplished utilizing ordinary heavy earthmoving equipment, however the bidding contractors should make

their own independent evaluation of the excavatability of the on-site materials prior to submitting their bids.

4. Subgrade Preparation

After the site has been cleared and stripped, the exposed subgrade soil in those areas to receive fill, building improvements and/or pavements should be scarified to a depth of 8 inches, moisture conditioned, and compacted to the requirements of "Compaction." In areas where dense undisturbed formational soils are exposed at the subgrade surface, the subgrade need not be scarified and compacted.

5. Low-Expansion Potential Fill/Soil Layer

Because of the high expansion potential of the more clayey formational soils, we recommend that the basement floor slab and any adjoining exterior slabs-on-grade east of the basement must be supported on an 18-inch minimum thickness of low-expansion potential soil. Where potentially expansive soil is exposed at or within 18 inches of the finish basement subgrade level, this will require that the soils be undercut and replaced with 18-inch thickness of compacted low-expansion potential on-site or imported sandy soil. In addition, in fill areas outside the perimeter of the basement the upper 18 inches of the finish subgrade soils should be a compacted low-expansion potential on-site or imported sandy soil. The suitability of soils for use beneath floor slabs should be determined in the field at the time of construction. The low-expansion potential soil layer should extend a minimum of 5 feet beyond the perimeter limits of any proposed adjoining exterior slabs-on-grade.

6. Materials for Fill

All on-site soils with an organic content of less than 3 percent by volume are in general suitable for reuse as fill except where low-expansion potential fill is required. Fill material should not contain rocks or lumps over 6 inches in greatest dimension and not more than 15 percent larger

than 2-1/2 inches. Any required imported fill material should be a low-expansion potential (U.B.C. expansion index of 30 or less), granular soil with a plasticity index of 12 or less. No more than 25 percent of the fill should be larger than 1/4-inch. All materials for use as fill should be approved prior to filling.

7. Compaction

All structural fill should be compacted to a minimum degree of compaction of 90 percent based upon ASTM Test Designation D 1557-78. The upper 6 inches of subgrade soil beneath pavements should be compacted to a minimum degree of compaction of 95 percent just prior to placement of the aggregate base layer. Fill material should be spread and compacted in uniform horizontal lifts not exceeding 8 inches in uncompacted thickness. Before compaction begins, the fill should be brought to a water content that will permit proper compaction by either: 1) aerating the fill if it is too wet, or 2) moistening the fill with water if it is too dry. Each lift should be thoroughly mixed before compaction to ensure a uniform distribution of moisture.

8. Temporary Construction Slopes

Based on our subsurface investigation work, laboratory test results, and engineering analysis, temporary cut-slopes for construction of the proposed retaining walls should be safe against mass instability at an inclination of 1 (horizontal) to 1 (vertical). In the event clean sandy soils with low cohesion are exposed in temporary cuts (such as encountered in Boring 5 from 4 to 11 feet) flatter inclinations may be necessary. Some localized sloughing or ravelling of the soils exposed on the slopes, however, may occur. Since the stability of temporary construction slopes will depend largely on the contractor's activities and safety precautions (storage and equipment loadings near the tops of cut-slopes, surface drainage provisions, etc.) it should be the contractor's responsibility to establish and maintain all temporary construction slopes at a safe inclination appropriate to his methods of operation.

9. Permanent Slopes

Any required cut and fill slopes must be constructed to an inclination no steeper than 2 (horizontal) to 1 (vertical). The project plans and specifications should contain all necessary design features and construction requirements to prevent erosion of the on-site soils both during and after construction. Slopes and other exposed ground surfaces should be appropriately planted with a protective groundcover.

Fill slopes should be constructed so as to assure that the recommended minimum degree of compaction is attained out to the finished slope face. This may be accomplished by "backrolling" with a sheepsfoot roller or other suitable equipment as the fill is raised. Placement of fill near the tops of slopes should be carried out in such a manner as to assure that loose, uncompacted soils are not sloughed over the tops and allowed to accumulate on the slope face.

10. Trench Backfill

Pipeline trenches should be backfilled with compacted fill. Backfill material should be placed in lift thicknesses appropriate to the type of compaction equipment utilized and compacted to a minimum degree of compaction of 90 percent by mechanical means. In pavement areas, that portion of the trench backfill material within the pavement section should conform to the material and compaction requirements of the adjacent pavement section.

11. Drainage

Positive surface gradients should be provided adjacent to the building, and roof gutters and downspouts should be installed so as to direct water away from foundations and slabs toward suitable discharge facilities. Ponding of surface water should not be allowed, especially adjacent to the building or on pavements.

B. Foundations

1. Footings

The proposed building must be supported on conventional, individual-spread and/or continuous footing foundations bearing on undisturbed natural soil and/or well-compacted fill material. All footings should be founded at least 24 inches below the lowest adjacent finished grade. Footings located adjacent to the tops of slopes should be extended sufficiently deep so as to provide at least 8 feet of horizontal cover or 1-1/2 times the width of the footing, whichever is greater, between the slope face and outside edge of the footing at the footing bearing level. Footings located adjacent to utility trenches should have their bearing surfaces situated below an imaginary 1-1/2 to 1 plane projected upward from the bottom edge of the adjacent utility trench.

At the recommended depths, footings may be designed for allowable bearing pressures of 4,000 pounds per square foot (psf) for combined dead and live loads and 5,300 psf for all loads, including wind or seismic. The footings should, however, have a minimum width of 12 inches. All continuous footings should contain top and bottom reinforcement to provide structural continuity and to permit spanning of local irregularities. A minimum of two No. 4 top and two No. 4 bottom reinforcing bars must be provided in the footing.

Settlements under building loads are expected to be within tolerable limits for the proposed structure. For footings designed in accordance with the recommendations presented in the preceding paragraphs, it is estimated that post-construction differential settlements between adjacent columns and/or walls should not exceed 1/4-inch in 25 feet.

2. Slabs-On-Grade

Concrete slabs-on-grade may be supported directly on low-expansion potential compacted fill soil and/or firm undisturbed low-expansion potential natural soil. Slab reinforcing as well as slab thicknesses should be designed in accordance with the anticipated use of and loading on the slab.

As a minimum, however, the slabs should have a minimum thickness of 4 inches and be reinforced with 6 x 6 - W1.4xW1.4 welded wire fabric to minimize hairline cracking of the slabs due to concrete shrinkage. The wire fabric should be supported on small concrete block chairs or equivalent prior to placement of concrete and not hooked into place in the slab. In some cases, hooking the wire fabric to lift it into position during placement of the concrete is not always effective and often results in the wire fabric being positioned at the bottom of the slab.

In areas where moisture-sensitive floor coverings are to be utilized and in other areas where floor dampness would be undesirable, consideration shall be given to providing an impermeable membrane beneath the slabs. The membrane should be covered with 2 inches of sand (minimum sand equivalent of 30) to protect it during construction. The sand should be lightly moistened just prior to placing the concrete.

3. Basement Walls

Basement walls must be designed to resist lateral earth pressures and any additional lateral pressures caused by surcharge loads on the adjoining retained surface. Basement walls must be designed for an equivalent fluid pressure of 40 pcf plus an additional uniform lateral pressure of $12H$ pounds per square foot where H = the height of backfill above the top of the wall footing in feet. Wherever walls will be subjected to surcharge loads, they should also be designed for an additional uniform lateral pressure equal to one-half the anticipated surcharge pressure.

The preceding design pressures assume that there is sufficient drainage behind the walls to prevent the build-up of hydrostatic pressures from surface water infiltration. Adequate drainage may be provided by means of weepholes with permeable filter material installed behind the walls or by means of a system of subdrains.

Backfill placed behind the walls should be compacted to a minimum degree of compaction of 90 percent using light compaction equipment. If heavy equipment is used, the walls should be appropriately temporarily braced.

Basement walls should be supported on footing foundations designed in accordance with the recommendations presented previously under "Footings." Lateral load resistance for the walls can be developed in accordance with the recommendations presented under Item B.4, "Lateral Loads."

4. Lateral Loads

Lateral load resistance for the building supported on footing foundations may be developed in friction between the foundation bottoms and the supporting subgrade. An allowable friction coefficient of 0.25 is considered applicable. An additional allowable passive resistance equal to an equivalent fluid weight of 350 pounds per cubic foot acting against the foundations may be used in design provided the footings are poured neat against the adjacent undisturbed native soils and/or compacted fill materials. These lateral resistance values assume a level surface in front of the footing for a minimum distance of 3 times the embedment depth of the footing and any shear keys and are based on a factor of safety of 1.5.

Impact Significance After Mitigation:

No geologic or soil conditions were identified in the geotechnical report that would pose a significant constraint to development of medical facilities on-site. Conformance with the Uniform Building Code, approval by OSA of geologic and geotechnical studies and structural design of the hospital facility, and recommendations made in the geotechnical study, as described above, would be necessary to mitigate potential impacts due to potentially expansive soils, or seismic activity. Potential geology/soils impacts will be mitigated to a level below significance by implementation of the proposed mitigation.

8) Water Conservation

Impact:

With construction of the hospital expansion, an additional 10,280 gpd would be expended on the site when compared with existing conditions. The project design includes a conceptual landscape plan proposing many low water use plant species throughout the site and an automatic moisture sensing and low precipitation rate sprinkler system in all landscaped areas. The water features on-site would use recirculated water to prevent water waste. Water consumption would be required during mass grading on the site and the applicant would work with the City of Chula Vista and the Sweetwater Authority to obtain a permit for temporary water consumption on-site.

Mitigation Summary:

Measures have been incorporated into the project design to reduce water consumption. These measures include landscaping with low water usage plant species, low water use irrigation systems and compliance with State standards for water conservation. Final landscape plans demonstrating incorporation of water conservation measures will be subject to review and approval by the City of Chula Vista staff prior to issuance of building permits for the proposed project.

Impact Significance After Mitigation:

Implementation of the proposed project would contribute to a significant cumulative need to conserve water on a region-wide basis. Use of low water usage species in the landscape plans, moisture sensing and low precipitation rate sprinkler systems and compliance with the State laws described above would help minimize water consumption on-site. However, due to the current drought condition that San Diego County is currently experiencing, the project would have cumulative unmitigated impacts associated with water use.

9) Public Services/Facilities

Impact:

Storm Drains

The proposed project would correct existing storm drain flooding problems affecting the adjacent junior high school by ducting the storm drain into the hospital's proposed storm drain system.

Fire

The proposed project would be constructed in compliance with Chula Vista Fire Department standards, including:

- All buildings including the parking structure will contain an approved standpipe and fire sprinkler system and a fire alarm system.
- Additional fire hydrants will be installed as required by the Chula Vista Fire Department.
- All State Fire Marshall CAC - Title 19 regulations shall be met.
- Provision of a 26-foot wide access road into Chula Vista Junior High School from the north interior road off of Fifth Avenue.

Furthermore, the City of Chula Vista Fire Department will work directly with the Sweetwater Authority to ensure adequate water pressure for emergency fire flows. The required fire flow for a fire sprinkler system shall be 3,000 gallons per minute.

Sewer

The sewer line in H Street is nearing capacity, therefore the applicant proposes to install a gravity sewer line and direct all sewage to C Street so as not to further impact the H Street line. Portions of the sewer lines in H Street and G Street are flowing near or over capacity at times of peak flow. Prior to issuance of any type of permit for project implementation, preparation of a technical report will be completed to the satisfaction of the City Engineer and incorporated

as conditions of project approval addressing the following items in both the H Street and G Street sewer systems:

- a) Average daily wastewater flow from the project.
- b) Peak wastewater flow from the project and the time and day of week when peak flow is expected to occur.
- c) Hydraulic analysis of the impact that peak flow will have on existing sewer lines from point of connection to the wastewater flow metering station. Existing flows shall be included.
- d) Recommendations for any improvements necessary to maintain flow in the sewers in accordance with City of Chula Vista design standards.

Schools

Although no direct student generation would occur with implementation of the proposed non-residential project, students may be indirectly generated as more employees are hired with expansion of the hospital facility and move into the area to live and work. School fees would be paid in accordance with State-mandated impact fee requirements.

Mitigation Summary

Storm Drains

Development of the subject site must comply with all applicable regulations established by the Environmental Protection Agency (EPA) as set forth in the National Pollutant Discharge Elimination System (NPDES) permit requirements for storm water discharge. If required, a NPDES permit would be obtained for any storm water discharge, discharge of wells, or temporary ground water dewatering associated with excavation for the parking garage and any below ground structural improvement.

Fire

With construction of the proposed project in compliance with the Chula Vista Fire Department Standards, no mitigation measures would be required.

Sewer

Preparation of a technical report shall be completed to the satisfaction of the City Engineer and incorporated as conditions of project approval addressing the items listed above for both the H Street and G Street sewer systems.

School

Payment of State-mandated impact fee requirements would mitigate any impacts to the school system with implementation of the proposed project.

Impact Significance After Mitigation

With implementation of the above measures, impacts to public facilities/services associated with the proposed project would be mitigated to a level below significance.

2.0 PROJECT DESCRIPTION

2.1 LOCATION

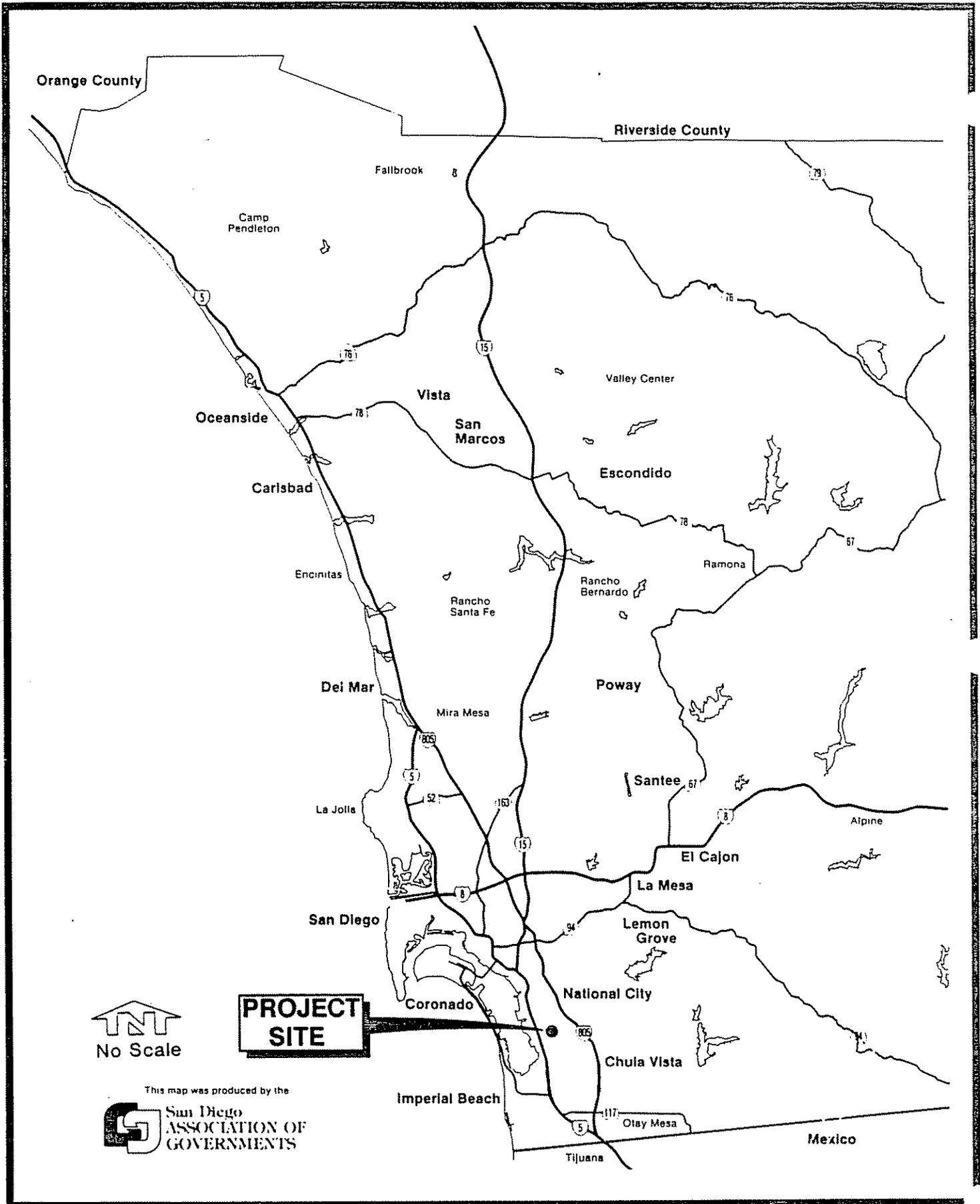
The Scripps Memorial Hospital Expansion project is located on approximately 13 acres east of I-5 in downtown Chula Vista. Fifth Avenue and H Street form the western and southern boundaries of the site and Fourth Avenue is approximately 300 feet to the east. A junior high school is located directly north of the project site. The project site is presently developed with the existing Scripps Memorial Hospital and several commercial uses. The existing commercial uses would be displaced with implementation of the proposed project. These uses include an existing gas station, Arby's Restaurant, Captain Kidd's Restaurant, Farrell's Ice Cream Parlor, Skateland, a theater, First Interstate Bank and a Readicare facility. The project site is located on page 69 of the Thomas Brothers Map Book, coordinate D-4. Figures 1 and 2 are regional and local vicinity maps illustrating the location of the proposed project.

2.2 PROJECT BACKGROUND

The project site has been developed for many years with medical facilities and a variety of commercial uses. Prior to its purchase by Scripps Memorial Hospital, the medical facility on the project site was known as Bay Medical Center. Scripps Memorial Hospital purchased Bay Medical Center in September 1986 when the medical center encountered financial difficulties. As a result of the financial difficulties, Bay Medical Center held overdue bonds with the City. When the possibility of a sale of the hospital became apparent, the City of Chula Vista, holding reversionary rights to the property, became a third party in the transaction. In order for Scripps Memorial Hospital to purchase the existing hospital, the City of Chula Vista had to be monetarily compensated for the outstanding bonds held against the hospital.

Discussions between the Chula Vista Redevelopment Agency and Scripps Memorial Hospital regarding a proposed hospital expansion began in 1988.

The Redevelopment Agency Agenda Statement from the May 23, 1989 meeting, herein incorporated by reference and on file with the City of Chula Vista, states that in 1989, the City of Chula Vista and the Redevelopment Agency were contacted by Scripps Memorial Hospital



**Scripps Memorial Hospital Expansion
Regional Vicinity Map**

**Figure
1**

with a proposal to expand the hospital with additional hospital facilities, parking areas and medical office space on an 8.9 acre parcel west of the existing Scripps Hospital acreage. It was understood by the Redevelopment Agency that the expanded hospital would replace existing commercial uses on the 8.9-acre parcel. Furthermore, due to the anticipated taxable value of the medical office building and parking garage, and the fact that the Scripps proposal required no financial subsidy as would be required by some of the commercial proponents, the hospital project compared favorably in terms of financial returns to the Agency.

The 8.9 acre parcel is located within the City of Chula Vista's Amended Town Centre II Redevelopment Plan area and therefore the Redevelopment Agency became involved with the proposed expansion. The site is designated on the Redevelopment Plan for retail commercial and office commercial uses. The Redevelopment Agency has received proposals for commercial uses on the site, as well as, the hospital expansion proposed by Scripps. Both the commercial and hospital expansion proposals were reviewed by the Redevelopment Agency. Prior to the expression of preference for the Scripps Memorial Hospital Expansion project by the Redevelopment Agency, six development alternatives had been analyzed by Community Development Department staff. These alternatives are described in detail in the Redevelopment Agency's May 23, 1989 Agenda Statement and included the following development scenarios:

1. Existing uses remaining on-site.
2. Scripps expansion, with First Interstate Bank and Readicare remaining.
3. Scripps expansion over entire site.
4. Malnik Supermarket Shopping Center, with First Interstate Bank, Arby's and Readicare remaining.
5. Champion Promotional Center over entire site.
6. Malnik Promotional Center, with First Interstate Bank, Arby's and Readicare remaining.

The six alternative development scenarios listed above are those that were under consideration at the time the Redevelopment Agency was considering the hospital expansion proposal. Following review of these alternatives, the Redevelopment Agency selected the Scripps Hospital

expansion, as proposed by the project analyzed in this EIR, as the preferred alternative. The Redevelopment Agency concluded that the proposed project would be consistent with the goals, objectives and provisions of the Amended Town Centre II Redevelopment Plan and that the quality of jobs created and the multiplier effect of salaries and cost of operation would be greater with hospital expansion than with commercial development (City of Chula Vista, 1989c). Because the project is authorized pursuant to a Conditional Use Permit within any zone of the City, and because the project is consistent with the goals, objectives and provisions of the Town Centre II Redevelopment Plan, the City has determined that a redevelopment plan amendment would not be necessary to implement the proposed hospital expansion project.

At the present time, additional consideration is being given to two alternative proposals to the Scripps Hospital Expansion project. The first proposal is the "H Street Business Coalition Alternative" which includes retention of Arby's, Readicare, and the First Interstate Bank in the first phase of the hospital expansion. The second proposal is a "retail and entertainment alternative" by Circinus Corporation (Wencke) which includes expanding commercial uses on the western 8.9 acres of the site.

On October 5, 1989, the Agency entered into a six-month Exclusive Negotiation Agreement with Scripps to develop an Owner participation agreement. This agreement was extended in March 1990 for an additional six months. On October 18, 1990, the Agency considered a second six-month extension of the agreement and determined upon recommendation of the City Attorney, to amend the agreement to become "semi exclusive" thereby allowing other owners and tenants on the site to submit redevelopment proposals.

Subsequently as mentioned above, two alternatives to the Scripps proposal were received and have been included in this recirculated Draft EIR as project alternatives (see Section 6.0).

-- Existing Ownership and Lease Arrangements

Scripps Memorial Hospital currently owns the 4.7 acres on which the existing medical facility is located. Existing ownership and leasehold interests of the 8.9-acre expansion area consists

of a fee title owner, a master ground lease and several subleases. The fee title owner granted a master ground lease of the property to a property management group in 1968 for 98 years. This group then sublet 0.5 acres to Readicare and First Interstate Bank and sublet the remaining 8.4 acres. The 8.4 acres has been sublet to the remaining existing businesses on the site: Farrell's Ice Cream Parlor, Skateland, Arby's, Captain Kidd's Restaurant, Express Gas, Scripps Hospital, and a theater. These existing commercial uses on-site would be removed with the proposed hospital expansion and the entire fee and leasehold would be transferred to Scripps Memorial Hospital.

2.3 DISCRETIONARY ACTIONS COVERED BY THIS DOCUMENT

This environmental impact report (EIR) addresses seven discretionary actions which would be required prior to development of the project site:

- A Conditional Use Permit (CUP) for the hospital master plan;
- Design Review of the hospital master plan and building design;
- A Special Permit due to location of a portion of the project site within a City redevelopment area;
- An Owner Participation Agreement with the Redevelopment Agency;
- Acquisition and disposition by voluntary sale or use of eminent domain of real property, including the possible use of Redevelopment Agency condemnation powers;
- A loan agreement with the Redevelopment Agency; and
- A lease guarantee agreement with the Redevelopment Agency.

The proposed CUP includes an overall master plan for phasing of the hospital expansion. A master planned approach to the project is desired to facilitate the expected phasing of project implementation and to ensure integrity of the hospital design throughout the buildout period. Phase I of the project is expected to begin in early 1993 and the ultimate phase of the project would be completed ten to fifteen years from then.

2.4 PROJECT DESCRIPTION

2.4.1 Project Goals and Objectives

Both the applicant and the redevelopment agency have identified goals and objectives for development of the 8.9 acre site. These goals and objectives are described below.

The City of Chula Vista, in the Town Centre II Redevelopment Plan, has identified 12 overall objectives for development within the Town Centre II redevelopment area. These objectives are listed below.

- Elimination of blighting influences, including incompatible land uses, obsolete structures, inadequate parking facilities, unsightly or unattractive signage and graphics, and inadequate landscape and townscape planning.
- Elimination of environmental, economic, social, platting, and physical deficiencies.
- The strengthening of the mercantile posture of Town Centre II, and the improvement of retail trade therein.
- The renewal of Town Centre II's physical plant and the improvement of its land use patterns and spatial relationships.
- The retention and expansion of viable land uses, commercial enterprises, and public facilities within the area.
- The attraction of capital and new business enterprises to the project area.
- The comprehensive beautification of the area, including its buildings, open space, streetscape, street furniture, graphics, and signage.

- Protection of peripheral residential enjoyment and land use integrity.

- The accommodation of future local and regional mass transit and related facilities; improvement of offstreet parking areas and provision for a mini-transit intra-project system.

- The establishment of design standards to assure desirable site design and environmental quality.

- The fostering of cooperation between the Town Centre II Project Area and the Chula Vista Town Centre Project Area (No. 1), and the protection of the goals, objectives, and economic resurgence of the latter.

- The continuing promotion of Subarea 1 of the Chula Vista Town Centre (No. 1) Project Area, as the principal center of specialty-goods purveyance in the South Bay Subregion. (Source: City of Chula Vista, 1988)

The applicant has identified five major objectives for the proposed project:

- Provision of better health care service to the surrounding community.

- Expansion of the existing hospital from 73,994 square feet and 159 beds to ultimately 446,344 square feet and 258 beds.

- Design of a more efficient traffic and parking system into and out of the hospital facility.

- Provision of a "wellness" atmosphere throughout the hospital for patients and visiting family members.

- Provision of additional medical office buildings near a newly renovated and expanded hospital facility.

Each of the factors listed above are considered to be critical by the applicant in the expansion of the existing hospital and the addition of medical office space.

2.4.2 Project Characteristics

The proposed project involves the expansion of the existing hospital, the addition of a new medical office building and a parking structure. It is anticipated that the project will be completed in phases with ultimate buildout expected in ten to fifteen years. Phase I of the project (Figure 3) would consist of the addition of approximately 120,560 square feet and 99 patient beds with a three-story plus basement hospital expansion building. The hospital expansion would be built approximately 40 feet west of the existing hospital and would be connected to the existing hospital by pedestrian corridors. Access to the hospital would be taken off of Fifth Avenue with a drop off entrance off of H Street and emergency (ambulance) access would be taken off of G Street, H Street and Fifth Avenue. In addition to the hospital expansion, a four-story medical office building consisting of approximately 62,180 square feet, would be constructed in Phase I. The medical office building would be located at the southwest corner of the site near the intersection of Fifth Avenue and H Street. An additional 370 surface parking spaces including 14 handicapped spaces would be provided with Phase I for a total of 542 parking spaces on-site. The handicapped parking spaces would be located near the entrance to the hospital lobby, near the emergency room entrance, and also near the entrance of the four-story medical office building.

The ultimate phase of the project (Figure 4) would provide further expansion to the hospital facility and medical office building and provide a parking structure in the northwest portion of the site. A three-story plus basement hospital building would be located west of the hospital expansion building constructed in Phase I and would consist of approximately 132,570 square feet. No new beds would be added to the total bed count with this addition. A three-story

hospital administration office consisting of 58,800 square feet, would be located where the existing single story hospital building of 24,140 square feet is currently located and a two-story plus basement diagnostic and treatment center consisting of 84,560 square feet would be located north of and attached to the existing four-story hospital tower and the proposed Phase I expansion. The 74,000 square foot existing hospital tower would be converted to approximately 37,000 square feet of office space and 37,000 square feet of storage space.

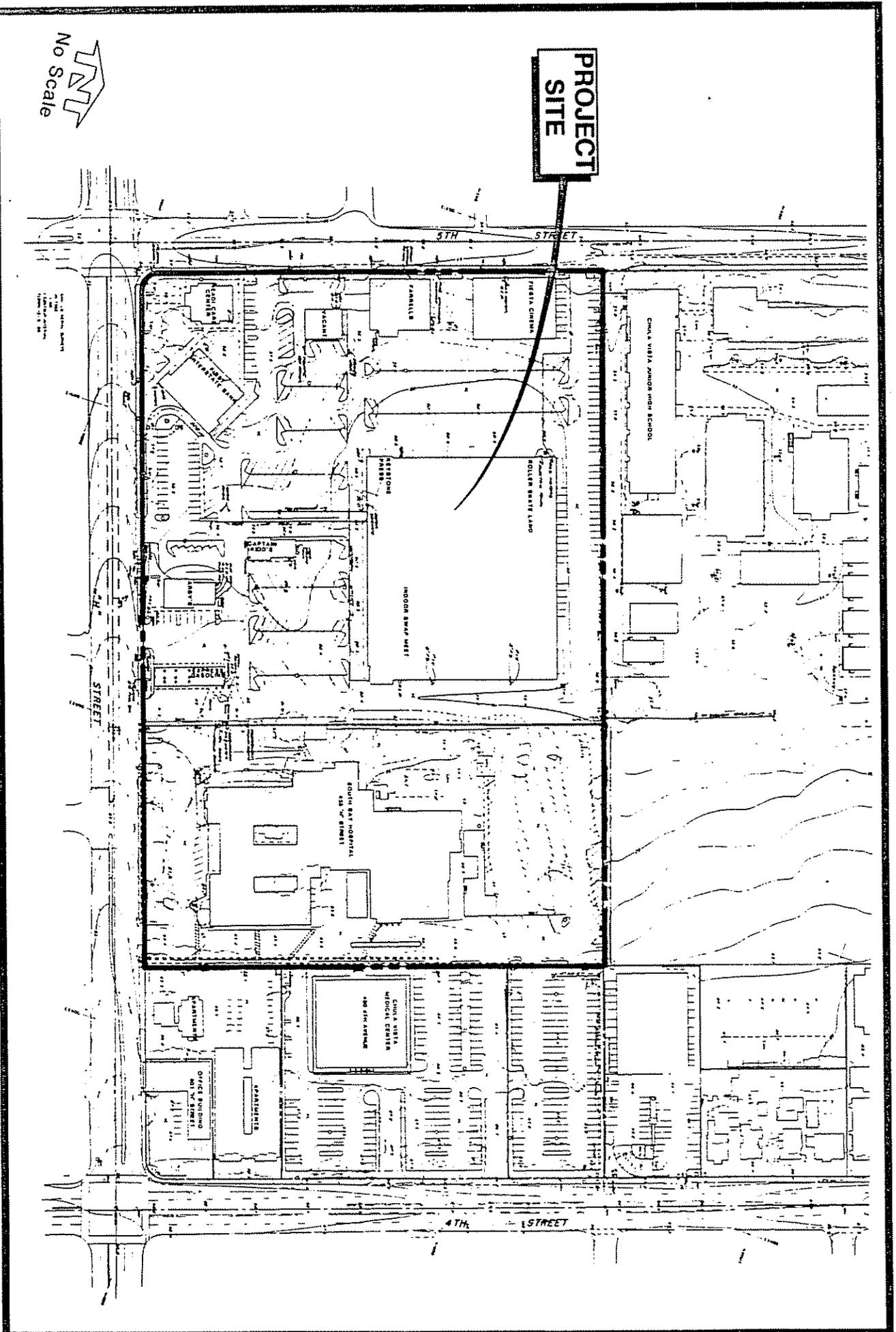
Prior to the implementation of the ultimate phase, the medical office building located in the southwest portion of the site would be expanded with the addition of a six-story "wing" consisting of approximately 62,240 square feet. A five level (one level below grade, one level at grade and three levels above grade) parking structure would be located in the northwest portion of the site where the additional surface parking was added in Phase I of the project. This parking structure would provide 775 parking spaces in addition to the 103 surface parking spaces on-site for a total of 878 parking spaces within the project boundary. All of the facilities on-site including the parking structure would feed in to a common pedestrian corridor that runs in an east/west direction through the site. This corridor would provide a pedestrian "spine" linking the main hospital facility with the medical office building and parking area to the west. Table 1 is a building area summary for Phase 1 and Phase Ultimate of the project.

Land Uses	Existing	Phase 1	Phase Ultimate	Total
Hospital	73,994	120,560	251,790	446,344
Medical Office Bldg	---	62,180	62,240	124,420
Parking Structure	---	---	263,380	263,380
Total	73,994	182,740	577,410	834,144

3.0 ENVIRONMENTAL SETTING

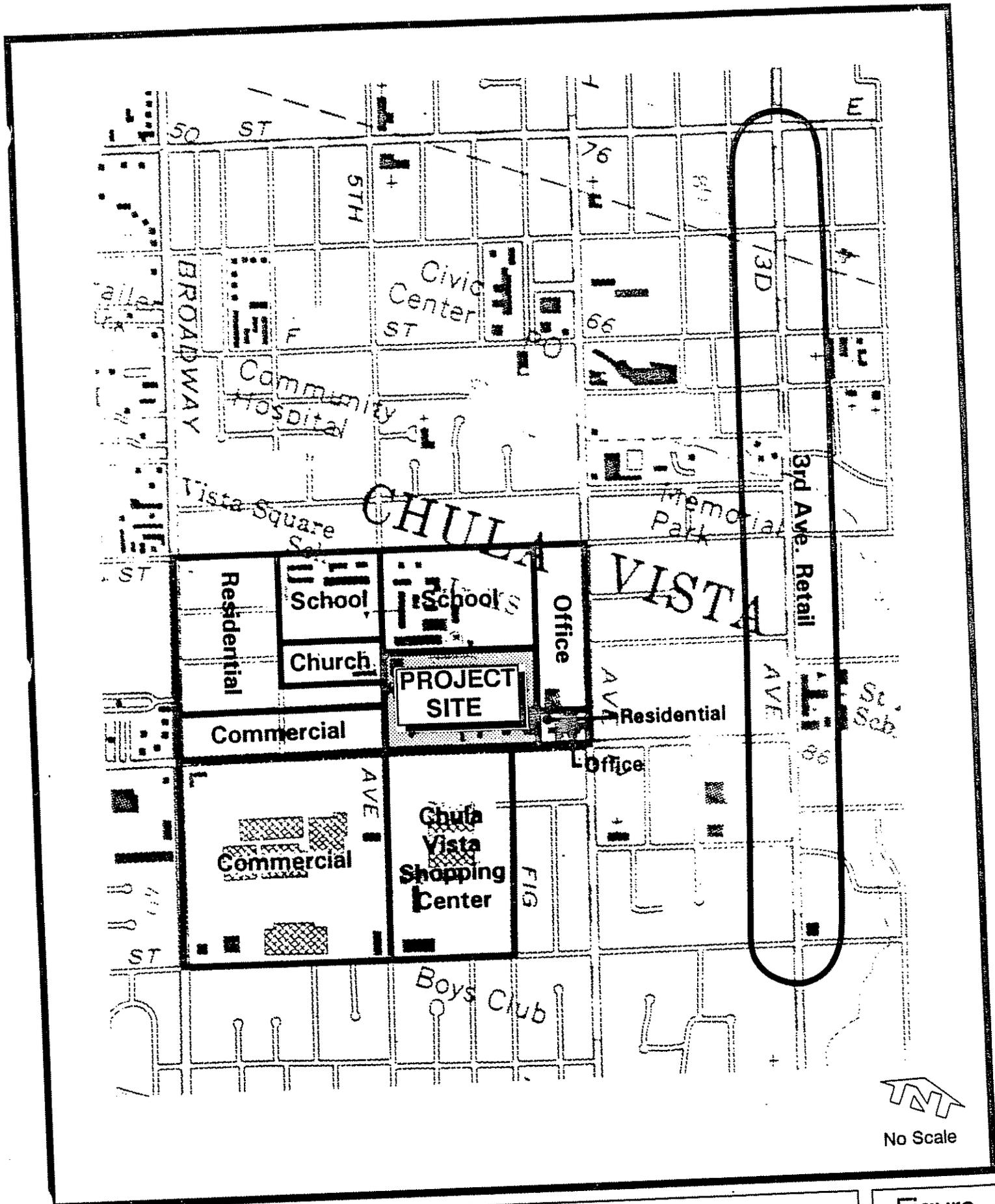
The Scripps Memorial Hospital Expansion project is located on approximately 13 acres east of I-5 in an existing urbanized portion of downtown Chula Vista. Fifth Avenue and H Street form the western and southern boundaries of the site and Fourth Avenue is approximately 300 feet to the east. A junior high school is located directly north of the project site.

As illustrated on Figure 5, the entire 13.6-acre site is essentially flat and currently developed with a variety of hospital and commercial uses. No native vegetation is present on the site. The eastern portion of the site (4.7 acres) is developed with existing hospital facilities. The existing hospital is a one and four-story building consisting of approximately 74,000 square feet and 159 patient beds. The western expansion portion of the project site (8.9 acres) is developed with commercial uses which would be displaced with the proposed expansion of the hospital. These commercial uses include an Arby's Restaurant, a gas station, Captain Kidd's Restaurant, Farrell's Ice Cream Parlor, Skateland, a theater, a bank, a Readicare facility and Jetco Furniture. These uses would be relocated with implementation of the proposed project. As shown on Figure 6, adjacent land uses include a junior high school directly north of the project site, the Chula Vista Shopping Center on H Street southwest of the project site, additional commercial uses to the east and west and a church and single family residences west of the site.



Scripps Memorial Hospital Expansion
Existing Conditions

Figure 5



Scripps Memorial Hospital Expansion
 Surrounding Land Uses

Figure
 6

4.0 ENVIRONMENTAL ANALYSIS

4.1 LAND USE/COMMUNITY CHARACTER

4.1.1 Existing Conditions

The Scripps Memorial Hospital Expansion site consists of approximately 13 acres east of I-5 in downtown Chula Vista. Fifth Avenue and H Street form the western and southern boundaries of the site with Fourth Avenue approximately 300 feet to the east.

-- Existing On-Site Land Uses

The project site is currently developed as the Scripps Memorial Hospital and a commercial complex consisting of several detached commercial buildings. The existing hospital occupies the easternmost 4.7 acres of the site and consists of approximately 74,000 square feet and 159 patient beds. The remaining 8.9 acres of the site, consisting of several detached commercial buildings, is located within the City of Chula Vista's Town Centre II Redevelopment Plan area. Existing commercial uses on-site are illustrated in Figure 5 and include the following:

Convenience Restaurants

- o Arby's and Captain Kidd's: These convenience restaurants are located adjacent to one another along the southern perimeter of the site.

Community Serving Facilities

- o First Interstate Bank: The bank building is located near the intersection of H Street and Fifth Avenue. It is highly visible from H Street and utilized by both pedestrian and vehicle traffic.
- o Express Gasoline: The gas station fronts H Street near the eastern edge of the 8.9 acre portion of the site and is highly visible from the roadway. It is a self

serve gas station serving both unleaded gasoline and diesel fuel. Air and water service is also available for a fee.

- o Readicare Center: This emergency urgent care center is located just west of the bank building at the intersection of Fifth Avenue and H Street. It is highly visible from both H Street and Fifth Avenue.
- o Farrell's Ice Cream Parlor: Farrell's Ice Cream Parlor is located immediately south of the Fiesta Cinema, fronting Fifth Avenue.

Youth-Oriented Facilities

- o Fiesta Cinema: This two-screen theater is located in the northwest corner of the site along Fifth Avenue.
- o Roller SkateLand: The skating rink is located in the northwest portion of the single story "Chula Vista Indoor Swap Meet" building located in the interior of the site. Hours of operation vary from day to day. The facility is used for private parties Mondays, Tuesdays and Thursdays. Wednesday evenings are reserved for adults only.

Other Uses On-site: A vacant building is located in the western portion of the site between the Readicare Center and the Farrell's Ice Cream Parlor along Fifth Avenue. A Warehouse Records store once occupied the building but has since relocated in the newly renovated Chula Vista Shopping Center located south of the project site across H Street.

The large single story "Chula Vista Indoor Swap Meet" building which houses Roller Skateland also leases out space to the neighboring Scripps Memorial Hospital. The personnel and financing offices as well as a temporary immunization clinic sponsored by Scripps are located within this building. Other than the above described uses, the

majority of the "Chula Vista Indoor Swap Meet" building was recently re-leased to Jetco Furniture which is storing, leasing and manufacturing furniture, and leasing a portion of the site out to concessionaires. At one time, the "Indoor Swap Meet," selling such items as clothing, jewelry, and sporting goods, was located in the building and was considered the main focus of the commercial center.

Community Setting

The project site and surrounding land uses are located within the Central Chula Vista Area bounded by I-5 and I-805 to the west and east, the city limits of National City to the north and "L" Street to the south. This area contains both the oldest and most central activities of the City, including the City's administration functions, retail, and office and institutional uses, and historical and residential neighborhoods.

Located within Central Chula Vista and encompassing a portion of the Bayfront Area is a collection of significant public and private uses; this subarea is referred to as the "Urban Core." The Urban Core of Chula Vista is the area of Chula Vista generally defined by E and H Streets on the north and south and Third Avenue and Marina Parkway on the east and west. This area lies within the Bayfront Area and includes the major facilities adjacent to those streets, including the project site. The Urban Core encompasses the traditional centers of activity for Chula Vista such as the Civic Center and Third Avenue retail center. It also contains the renewed activity areas of the renovated Chula Vista Shopping Center, trolley stations and possible redevelopment of office and higher density residential uses along Woodlawn and portions of the Bayfront.

A variety of land uses surround the Scripps Memorial Hospital expansion site. A junior high school is located north of the project site. The project applicant is currently working with Chula Vista Junior High School to trade a portion of the northwestern area of the project site so that the junior high school would own additional land to provide additional classrooms. In exchange, the applicant may obtain a portion of the eastern edge of the school property to create a north/south access to the project site from G Street which allows alternative access from project-generated traffic.

The Chula Vista Shopping Center is located south of the project site across H Street. The shopping center is located within the City of Chula Vista's Town Centre II Redevelopment Plan area and was renovated and expanded in 1988. The renovation and expansion of the shopping center included the vacation of a portion of Fifth Avenue which had previously bisected the shopping center, and the addition of approximately 141,400 square feet of leasable area in new primarily single story, mall shops. The result is a contiguous shopping center with two large department stores located at either end. A food court offering a wide variety of food menus is located in the center of the mall on a split level. Youth-oriented facilities located within the mall include a child's train ride near the food court and a carousel located near the western end of the mall. The Chula Vista Shopping Center is currently proposing additional expansion including a movie theater as well as the addition of a fourth major department store (Mervyn's).

The Third Avenue retail area is located between "E" and "I" Streets approximately 0.5 miles northeast of the project site. The retail character of Third Avenue is distinct in that it serves residents that live within and adjacent to the downtown area. Commercial facilities located within the Third Avenue commercial area include several restaurants and community services including banks, clothing and book stores and movie theaters. The largest of the theaters houses six movie screens. The Third Avenue retail area is located within the City's Town Centre I redevelopment area. One of the objectives of the Town Centre II Redevelopment Plan is to continue the promotion of the Town Centre I redevelopment area as the principal center of special goods purveyance in the South Bay area.

In summary, the project site is located within the central core of downtown Chula Vista comprised of a variety of commercial, civic, institutional and residential uses. The existing Scripps Hospital is one of the primary institutional uses within the City's central core.

-- Existing Land Use Designations

Land use designations applicable to the project site include those in the Chula Vista General Plan, the Central Chula Vista Area Plan, the Chula Vista Municipal Code, and the Town Centre II Redevelopment Plan. Existing land use designations are illustrated in Figure 7 and summarized below.

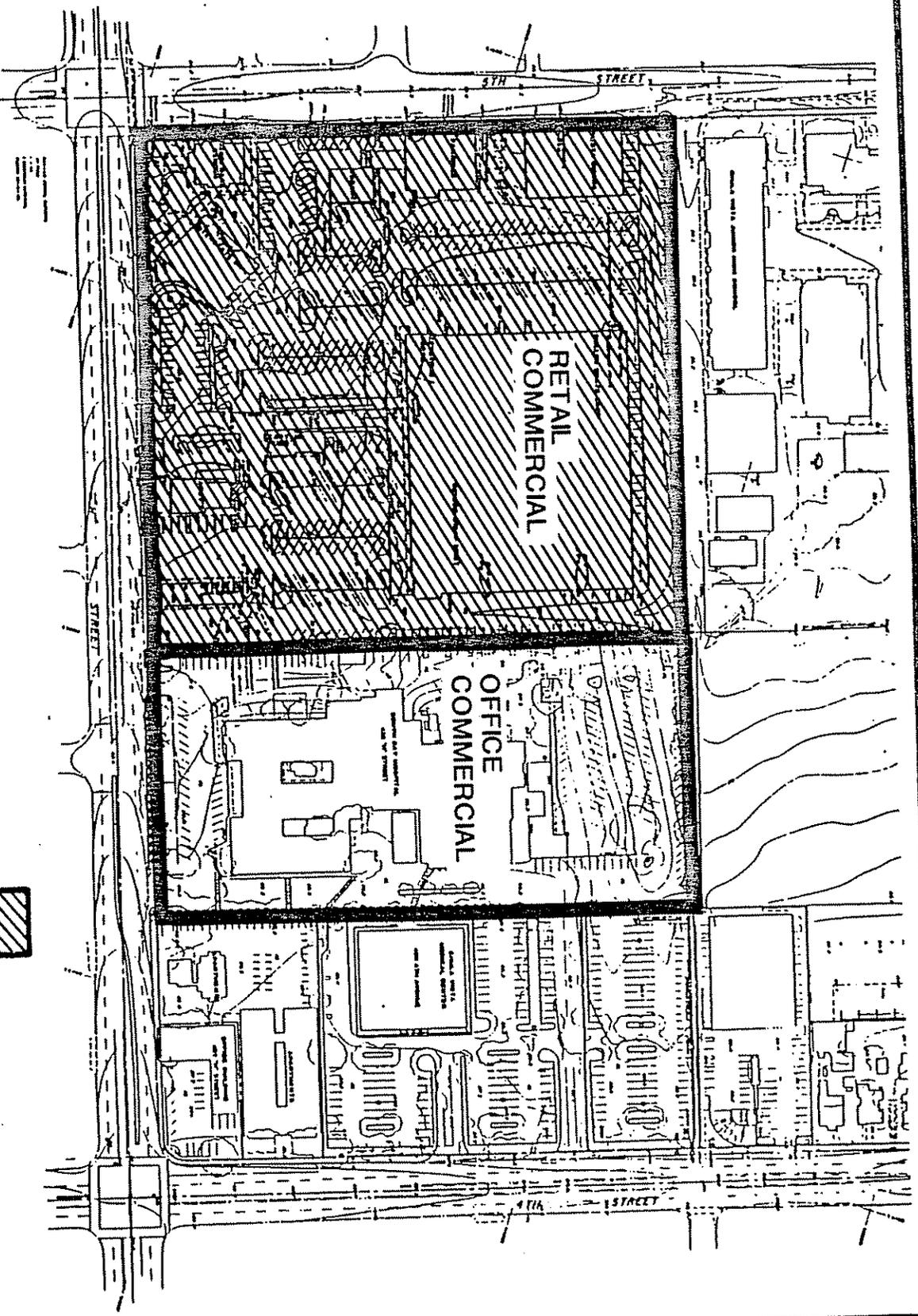
Chula Vista General Plan

According to the Chula Vista General Plan, the project site is designated as retail commercial (the western 8.9 acres) and office commercial (the eastern 4.7 acres). The retail commercial designation is characterized by neighborhood, community and regional shopping centers and retail establishments typical of traditional downtowns. Hospital facilities are permitted within this land use designation with an approved Conditional Use Permit. The office commercial designation is characterized by professional and administrative office uses. Hospital facilities are an allowable use within this designation.

Central Chula Vista Area Plan

The Scripps Memorial Hospital expansion project is located within the Central Chula Vista plan area. The Central Chula Vista Area Plan includes a variety of goals and objectives for improving and maintaining the quality of life and vitality of Central Chula Vista. These goals include:

- Encouraging development that leads to a recognizable community and distinct place to enjoy both living and working as well as enjoying cultural and recreational pastimes.
- Through continued development, reinforcing the area as a focus of the larger city wide community.



Scripps Memorial Hospital Expansion
 Existing Land Use Designations

Figure
 7

The Central Chula Vista Area Plan, like the Chula Vista General Plan, designates the site for retail commercial and office commercial uses. Hospital uses are consistent with the existing Central Chula Vista land use designations.

Town Centre II Redevelopment Plan

The western 8.9 acres of the project site were added to the City of Chula Vista's Town Centre II Redevelopment Area in 1988 with amendments to the City's Town Centre II Redevelopment Plan. At the time the site was added to the Redevelopment Area, the Town Centre II Redevelopment Plan identified the site for rehabilitation/redevelopment with possible commercial uses. With respect to the Indoor Swap Meet site, the 1988 Redevelopment Plan notes that the Redevelopment Agency "desires to use redevelopment tools to facilitate redevelopment of the site with complimentary uses (complimentary to the redeveloped Chula Vista Shopping Center on H Street) to enhance the economic viability of the area."

The Town Centre II Redevelopment Plan designates the project site for "central commercial" uses. Central commercial designated areas "may be used as a mix of regional-type commercial uses, including but not limited to retail, office, service, entertainment, educational and auxiliary uses." (City of Chula Vista, 1978). The City of Chula Vista has determined that the proposed hospital expansion project is consistent with the goals, objectives and provisions of the Town Centre II Redevelopment Plan. Because the project is authorized pursuant to a Conditional Use Permit within any zone of the City, and because the project is consistent with the goals, objectives and provisions of the Town Centre II Redevelopment Plan, the City has determined that a redevelopment plan amendment would not be necessary to implement the proposed hospital expansion project.

Zoning

The designated zones for the project site are C-O (Administrative and Professional Office zone) for the eastern 4.7 acres of the site and C-C-D (Central Commercial zone) for the

western 8.9 acres. The purpose of the Administrative and Professional Office zone is to provide appropriate locations where professional and administrative office uses may be established, maintained and protected. The regulations of this zone are designed to promote a quiet and dignified environment for business administration, professional and government activities, free from the congestion and traffic of the usual retail business district. The purpose of the Central Commercial zone is to stabilize, improve and protect the commercial characteristics of the major community business centers. The C-C-D zone designation is intended to be applied in the general location of such centers as designated in the Chula Vista General Plan. Health oriented uses such as hospital facilities are allowed within the existing zones with an approved Conditional Use Permit.

4.1.2 Potential Impacts

-- Relationship to Adopted Plans

Implementation of the Scripps Memorial Hospital Expansion would expand the existing hospital from its current 73,994 square feet situated on 4.7 acres of land to its ultimate size of 446,344 square feet on 13.6 acres. A medical office building (62,180 square feet with Phase I and 124,500 at phase ultimate) and parking structure are also proposed for the site. The proposed hospital expansion would be consistent with existing General Plan, Zoning and Redevelopment Plan designations for the project site. The uses proposed by the project are consistent with the existing land use designations if regulated by a conditional use permit. As described in Section 2.0, Project Description, a master conditional use permit is proposed for the project. By concentrating uses within the urban core, and providing for infill development, the project also implements one of the environmental goals of the Land Use Element of the General Plan: Central Chula Vista Area Plan which calls for encouragement of development in the project area which reinforces the area as a focus for the larger city-wide community.

-- Business Relocations

Implementation of the Scripps Memorial Hospital expansion project would involve the displacement of existing commercial uses located on the western 8.9 acres of the project site. Potential impacts associated with such displacement include direct impacts to

existing commercial tenants and loss of commercial uses on-site serving the surrounding neighborhood. At this time, the applicant is actively searching for relocation sites for the youth-oriented facilities on-site. The relocation of the remaining commercial uses on-site will proceed after an Owner Participation Agreement has been executed between the Agency and Scripps Hospital.

Depending upon the identified relocation sites, supplemental environmental review of the relocated businesses will be required. Such environmental review would take place at the time relocation plans are prepared and a relocation agreement is reached by the Redevelopment Agency.

-- Community Character

Uses to be displaced from the project site include restaurants, a gas station, a bank, a readicare center, a cinema and a youth-oriented roller skating facility. As discussed above, the "Urban Core," in which the project site and its surrounding land uses are located, provides uses similar to those which would be displaced within one mile of the project site. These uses include the Chula Vista Shopping Center located across the street from the project site. The shopping center provides an overall destination for the young and old as well as several restaurants, retail shops and youth oriented facilities such as the children's train ride and carousel. A movie theater is proposed to be located in the Chula Vista Mall with the proposed expansion. Movie theaters, restaurants, specialty shops and service oriented businesses such as financial, medical and professional services can also be found along Third Avenue in the Town Centre I Redevelopment Area. Broadway Avenue, located one block west of the project site is comprised of highway-related, community serving retail uses, including automotive, hotels/motels and restaurants. These commercial areas, the Chula Vista Shopping Center, Third Avenue and Broadway areas, provide the full range of services currently present on the site as well as additional commercial uses. These uses are within the "Urban Core," as is the proposed project, and are easily accessible to neighborhood residents. Because of the variety of commercial uses adjacent to and surrounding the

project site within the "Urban Core," significant community character impacts associated with the loss of commercial uses on the project site are not anticipated.

During the previous public review of the draft EIR, comments were received from the public suggesting that displacement of commercial businesses from the project site would, in itself, be a significant adverse and unmitigable impact. Although this comment has been noted, it has been concluded that displacement of these commercial uses would not produce significant impacts due to the location of similar uses in the project area.

4.1.3 Mitigation Measures

As no significant land use/community character impacts are expected to occur, no mitigation will be required.

4.1.4 Analysis of Significance

The proposed project is consistent with existing land use designations and with redevelopment plans for the project site. The project provides for infill development within the Urban Core of central Chula Vista, consistent with one of the environmental goals of the City's Land Use Element of the General Plan. Loss of commercial uses on the site would not significantly affect the existing community character due to the location of similar commercial uses within one mile of the project site. Significant land use/community character impacts are not anticipated. Therefore, land use/community character impacts are not significant.

4.2 VISUAL QUALITY

This section analyzes the existing on-site character of the project site along with the existing urban design character and streetscape in the project area. Potential changes both on-site and in the surrounding area are described.

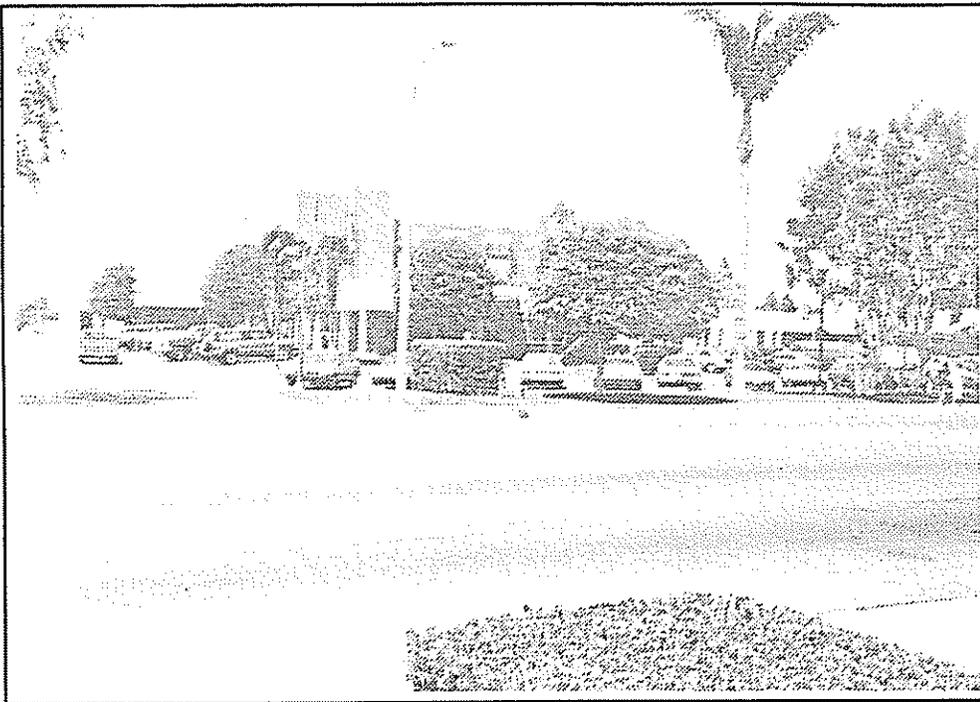
4.2.1 Existing Conditions

-- Existing Visual Character On-site

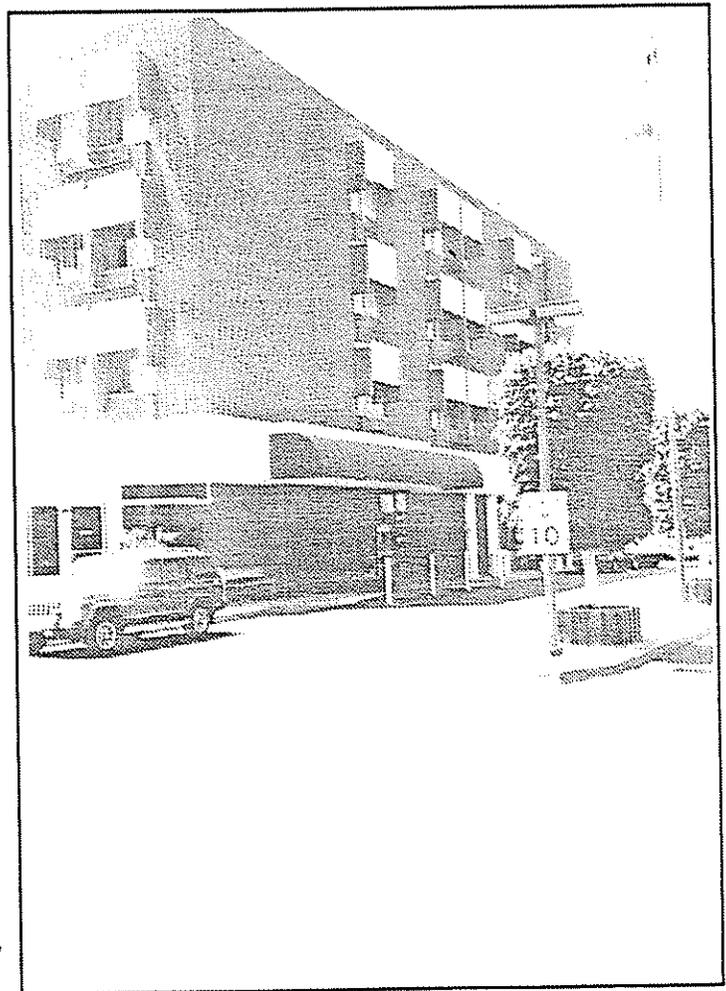
The existing visual character of the project site is that of a fully developed commercial complex (western 8.9 acres) and a 73,994 square foot hospital facility (eastern 4.7 acres). The entire 13.6 acre project site consists of generally flat terrain with elevations ranging from 68-feet above mean sea level (AMSL) in the eastern portion of the site to 55-feet AMSL in the western portion of the site. Due to the flat topography and urbanized nature of the area, no views or vista points currently exist on or from the site.

The hospital facility currently consists of a single story administration building and four story patient tower. The architecture of the hospital is characterized by a brick outer layer with white stucco accents. The hospital was built in 1962 and occupies the majority of the eastern 4.7 acres of the site. A total of 162 parking spaces are located along the perimeter of the hospital site. Mature ornamental trees are scattered throughout the parking areas and along the sidewalk adjacent to H Street. The visual character of the existing hospital facility is shown in Figure 8.

The commercial complex located on the western portion of the site was built in the mid to late 1970's and consists of several architecturally dissimilar commercial buildings. The largest commercial building on the site is located in the northeast quarter of the site. Several smaller outlying buildings are present on the southern and western portions of the site. One of these buildings is vacant and the remainder are occupied by a variety



**Existing Hospital Facility -
Northern View**



**Existing Hospital Entrance -
Northwest View**

**Scripps Memorial Hospital Expansion
Onsite Hospital Facility**

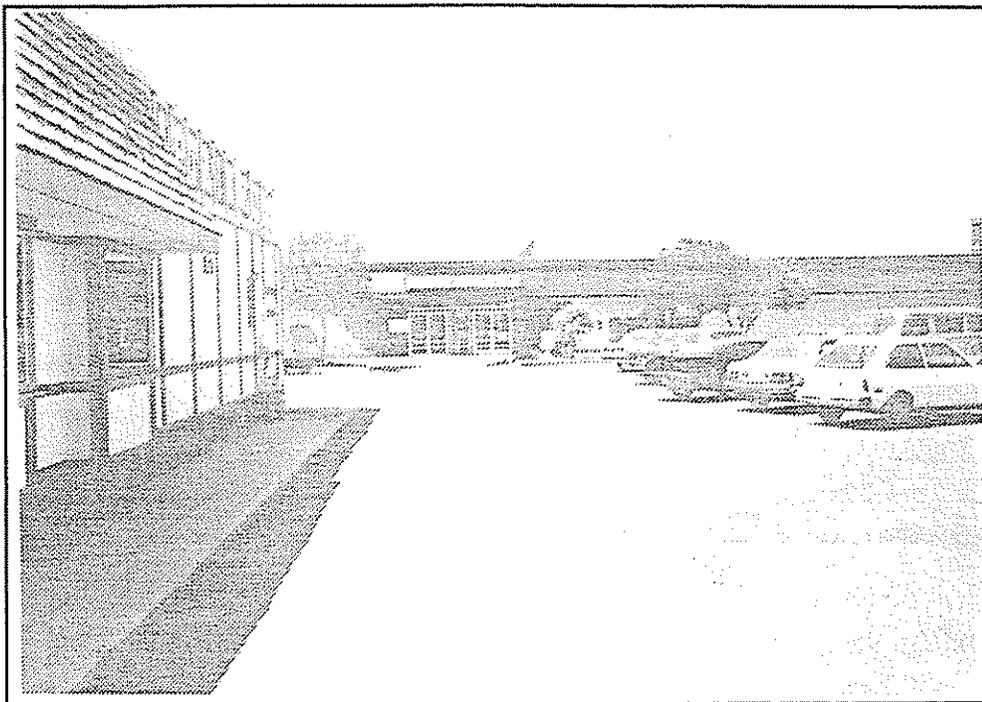
**Figure
8**

of commercial uses. Landscaping design within the commercial site consists of ornamental trees which are present in isolated locations within the parking area and along the perimeter of the site. A sidewalk is provided along the southern and western boundaries of the site (along H Street and Fifth Avenue). Landscaping is present along H Street in the vicinity of Arby's, First Interstate Bank and the Readicare Center. The visual character of the existing commercial development on the western portion of the site is illustrated in Figures 9 and 10.

-- Existing Visual Character - Surrounding Streetscene

Land uses surrounding the project site include residential, office/professional and commercial uses. In general, the surrounding residences appear to have been constructed in the 1950's and 1960's and occur west and north of the project site (on Fifth Avenue and G Street) while commercial and office/professional uses occur south and east of the site (on H Street and Fourth Avenue). A prominent commercial use adjacent to the site is the newly renovated Chula Vista Shopping Center which provides a distinctive commercial element along H Street. In general, the appearance of the shopping center along H Street is that of parking with associated landscaping, a landscaped entryway, and 1-3 story commercial structures setback from the roadway.

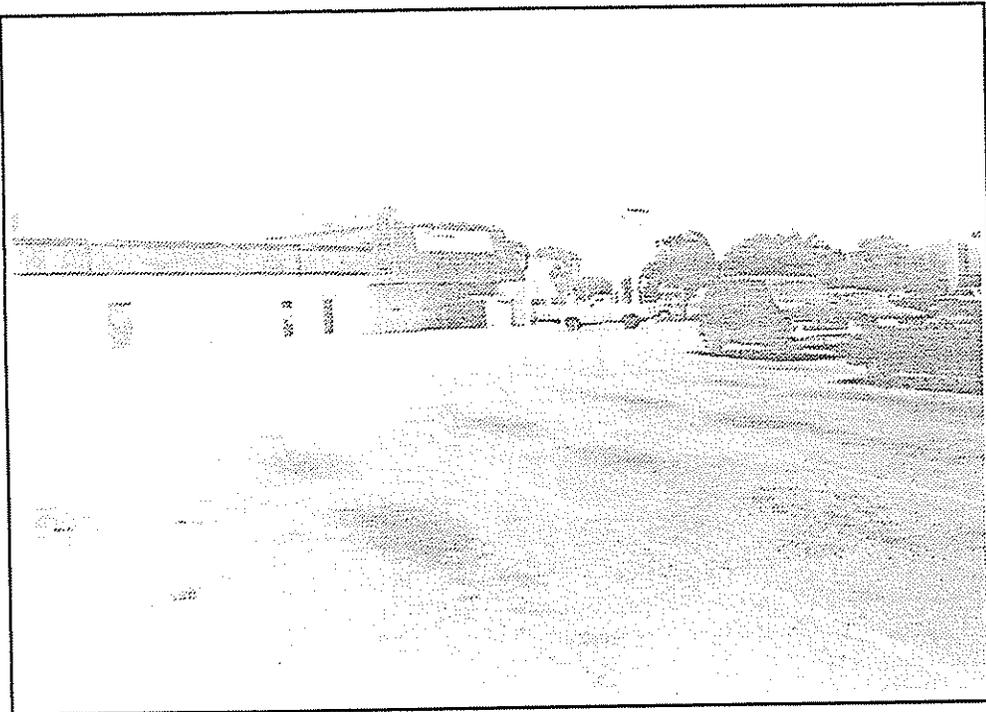
The site is visible primarily from H Street and Fifth Avenue. H Street, which provides the primary access to the site, is currently constructed as a four-lane roadway with sidewalks on both the north and south sides of the street. Existing landscaping along H Street between Fourth and Fifth Avenues is limited to street trees planted on the south side in conjunction with the newly renovated Chula Vista Shopping Center and scattered street trees on the north side associated with the existing commercial and hospital development. No landscaped strips between the roadway and the sidewalk or median landscaping currently exist along this portion of H Street. Figure 11 illustrates the existing streetscape along H Street.



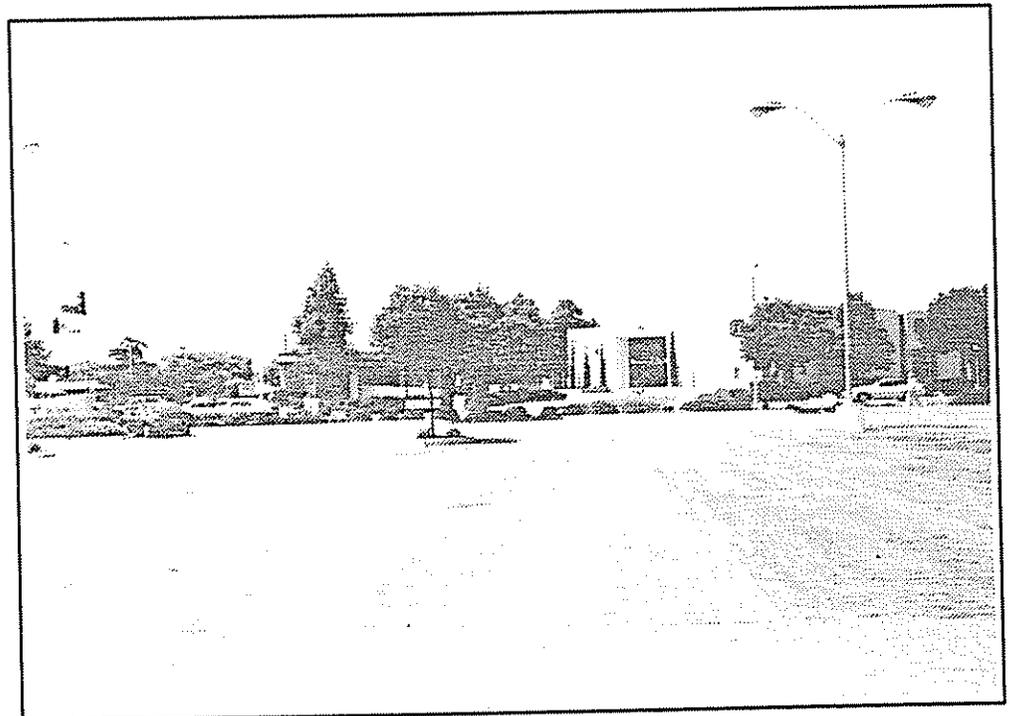
Fast Food Establishment and Indoor Swap Meet Building - Northern View



Convenience Restaurant - Eastern View



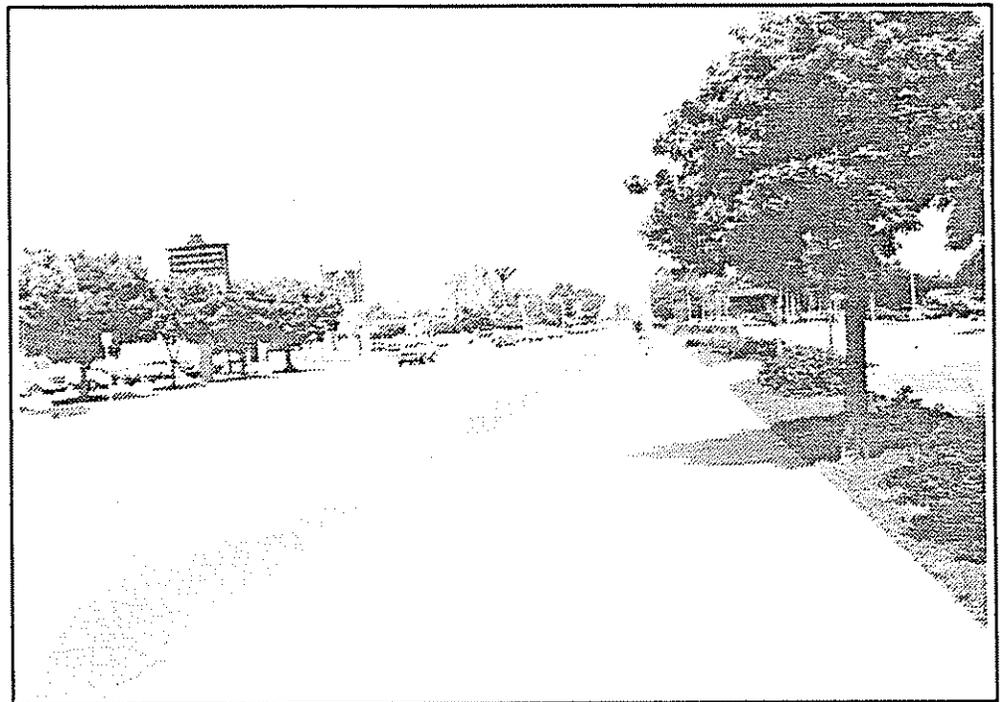
Indoor Swap Meet Building - Southwest Corner



Community Serving Facility - Northern View



**Existing Entrance to Chula Vista Shopping Center (foreground);
Future Entrance to Hospital Site (background)**



Street Scene "H" Street - Eastern View

Fifth Avenue is currently constructed as a two-lane roadway with on-street parking and sidewalks on both sides of the street. Landscaping is similar to that along H Street although the character of Fifth Avenue, with its residential and institutional uses, is markedly different than the distinct commercial character along H Street.

Fourth Avenue, located approximately 300 feet east of the eastern boundary of the site, is designated a scenic highway in the Chula Vista General Plan. This designation is due to the fact that Fourth Avenue is the only continuous major north-south street through the central part of the city that is not dominated by commercial land uses. According to the Chula Vista General Plan, the landscape treatment of Fourth Avenue should establish it as the north-south concourse for residential and public institutional uses in the city similar to the way F Street will be an east-west concourse for these uses. This is in contrast to E Street, H Street, Third Avenue and Broadway which, although upgraded with new and higher quality development, will remain commercial and retail thoroughfares in the City.

-- Regulatory Framework

The proposed project design is subject to review and approval by the City of Chula Vista's Design Review Committee (DRC). The City has a well-developed design review process and requires extensive review of master planned projects such as the proposed hospital expansion. The 5-member DRC is advisory to the Planning Commission and the City Council and is made up of appointed citizens. The DRC evaluates both the on-site character of a project and its compatibility with the overall urban fabric of the City.

Neither the Town Centre II Redevelopment Plan nor the Central Chula Vista Area Plan contain design guidelines to direct redevelopment of the project site. A 100-foot height limit (approximately 10 stories) does, however exist within the Town Centre II Redevelopment Plan Area.

4.2.2 Potential Impacts

Implementation of the proposed project would involve the removal of several commercial buildings on the project site and the development of the property as an expanded hospital and medical office facility and parking structure. Project implementation would occur in two phases, with phase one construction beginning in late 1992 or early 1993 and the phase ultimate construction occurring at various times over the next 10-15 years.

-- Anticipated On-Site Visual Changes

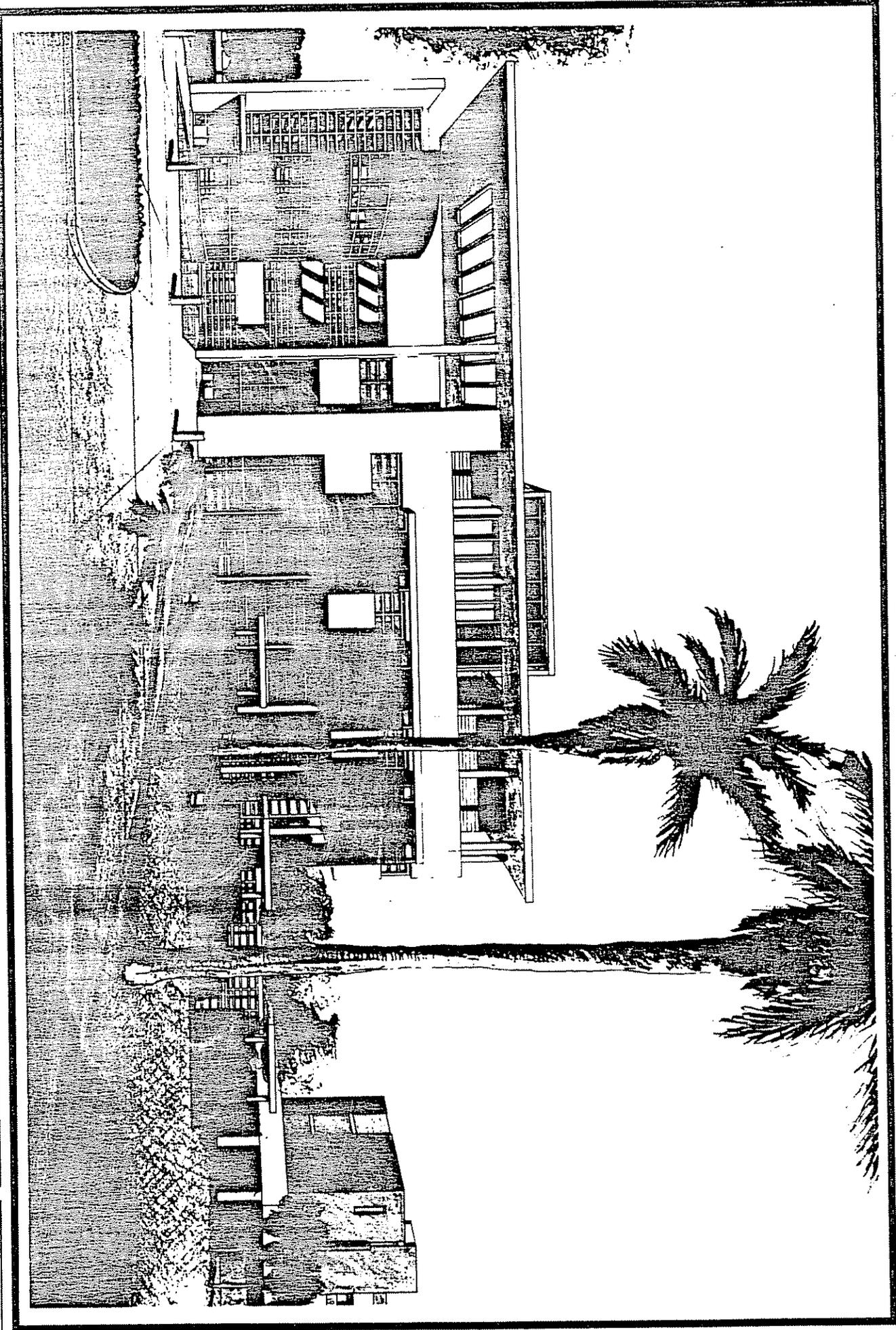
With implementation of the proposed hospital expansion, the visual character of the project site would change from that of a developed site with a hospital facility and an assortment of commercial uses to that of a master-planned medical center and associated medical offices, facilities and parking. Due to the flat terrain and developed nature of the site and the surrounding community, no views or vistas of or from the site exist which would be obstructed by the proposed hospital expansion.

As described above, the proposed hospital expansion would be implemented in phases; with the exception of the existing hospital, existing commercial uses on the site would be removed with the phase one hospital expansion. Visual changes associated with the phase one development would involve removal of the existing uses on the western 8.9-acre parcel and development of that portion of the site with the initial 4-story medical office building and a 3-story hospital expansion. The plaza entry feature along H Street would be provided during phase one. Surface parking would be provided in the area proposed for the parking structure as part of the phase one development. No changes are proposed in the eastern 4.7 acres of the site as part of the phase one development. A landscape plan has been prepared for the phase one development scenario as described below and illustrated in Figure 12 to integrate undeveloped portions of the site during phase one into the overall hospital design. Perimeter landscaping would be provided on the entire frontage along H Street and Fifth Avenue and on the north side of the site adjacent to the junior high school. The general visual character associated with the phase

one development would remain on the site over a 10-15 year period as the hospital expansion occurs in various phases until the phase ultimate development is achieved.

As noted in Section 2.0, Project Description, a master-planned CUP is proposed for the project to allow for phased implementation of the hospital expansion in an integrated and coordinated manner. Incorporated in the CUP are landscape plans for the initial and ultimate phases of development. These landscape plans are illustrated in Figures 12 and 13. As shown on Figures 12 and 13, 15-gallon 24-inch and 36-inch boxed trees such as Jacaranda and Brazilian Pepper or others approved by the City's (omit per B. Sennett) Landscape Architect would be planted along the perimeter of the site and within the surface parking area during the initial phase of development. Trees would also be planted on the top level of the parking structure during the ultimate phase development. The secondary entrance courtyard on H Street would be planted with 15-gallon 24-inch and 36-inch boxed trees and a hydroseed mixture to provide an aesthetically pleasing entrance to the facility. Landscape features proposed on-site include several interior courtyards, with possible water features, to provide pleasant views from patient rooms, lawn areas, and signed entry features. Interior courtyards are proposed between the hospital towers and in the central portion of the administration facility. An entry court is also proposed at the H Street access point with textured paving and landscaping to provide a pleasant drop-off experience to the hospital and the medical office building. The H Street entrance is proposed to be located opposite the existing entrance to the Chula Vista Shopping Center. A pedestrian spine is proposed through the medical center from the Fifth Avenue entry point. Access to the hospital courtyards would be provided from the indoor/outdoor spine.

The architecture associated with the proposed hospital expansion has been designed to conform with the existing hospital building, using building materials such as brick and white stucco. The anticipated architectural character of the proposed expansion structures is illustrated in the artist's rendering, included as Figure 14. Horizontal accents such as windows with small mullions and roof bands and beams would be incorporated into the architecture of the hospital building.



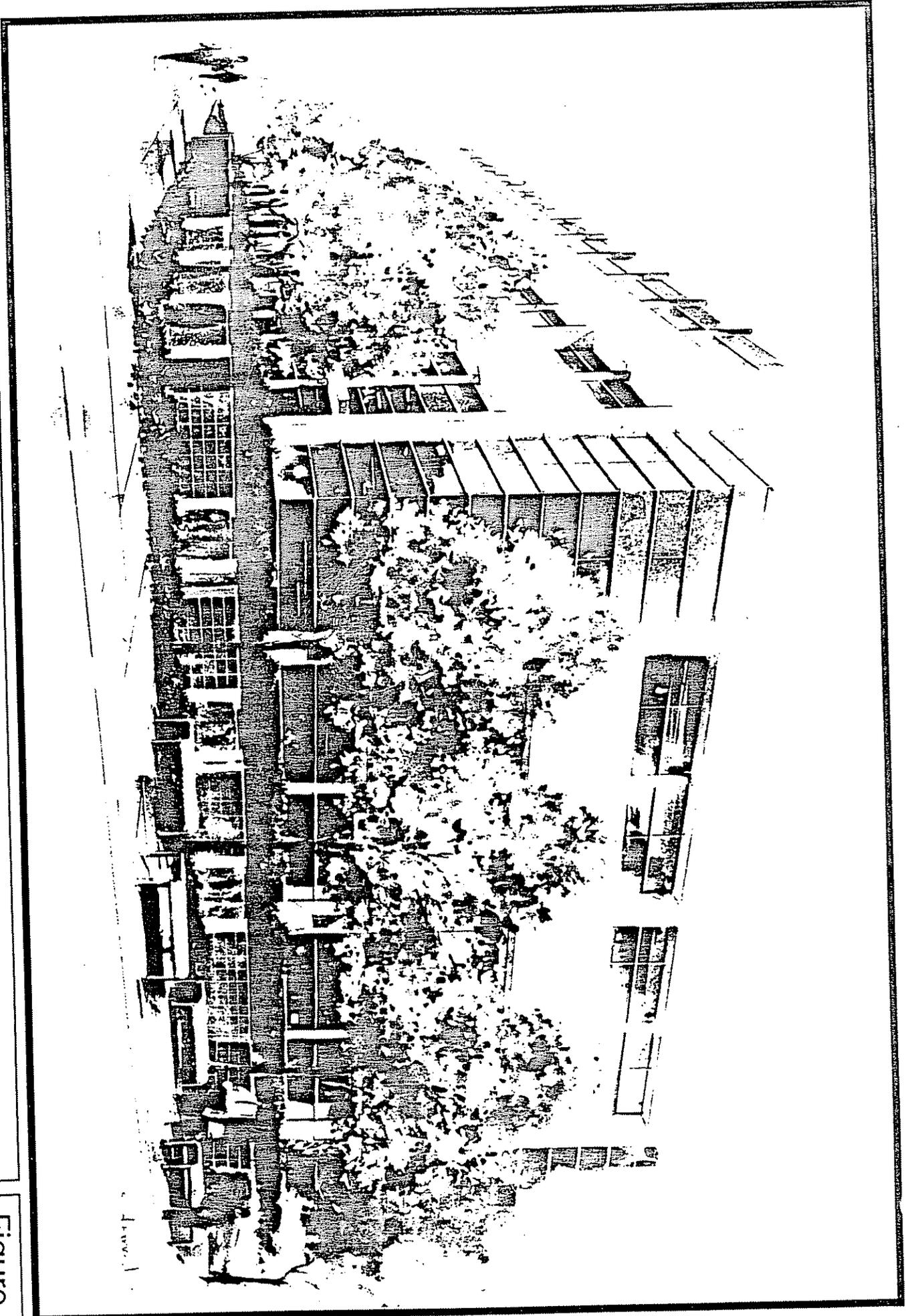
Scripps Memorial Hospital Expansion
Proposed Hospital Design

Figure
14

In conjunction with their ongoing review of the project, the City's DRC had expressed concern over the mass of the medical office building proposed at the corner of Fifth and H Streets. The concern was due primarily to the relationship of the proposed mid-rise medical office building to existing commercial buildings in the area, mostly single, two and three story buildings. After several meetings with DRC, a redesign of the medical office building was completed by the applicant, eliminating one-level of the Phase I medical office building, designing a four-story building instead of a five-story building. The four-story building would be set back 48 feet from H Street and 25 feet from Fifth Avenue. In Phase Ultimate, the construction of a six-story medical office building wing would be added. The taller Ultimate Phase portion of the medical office building would be set back a minimum of 100 feet from H Street and Fifth Avenue, minimizing the apparent bulk and scale of the structure as viewed from the street.

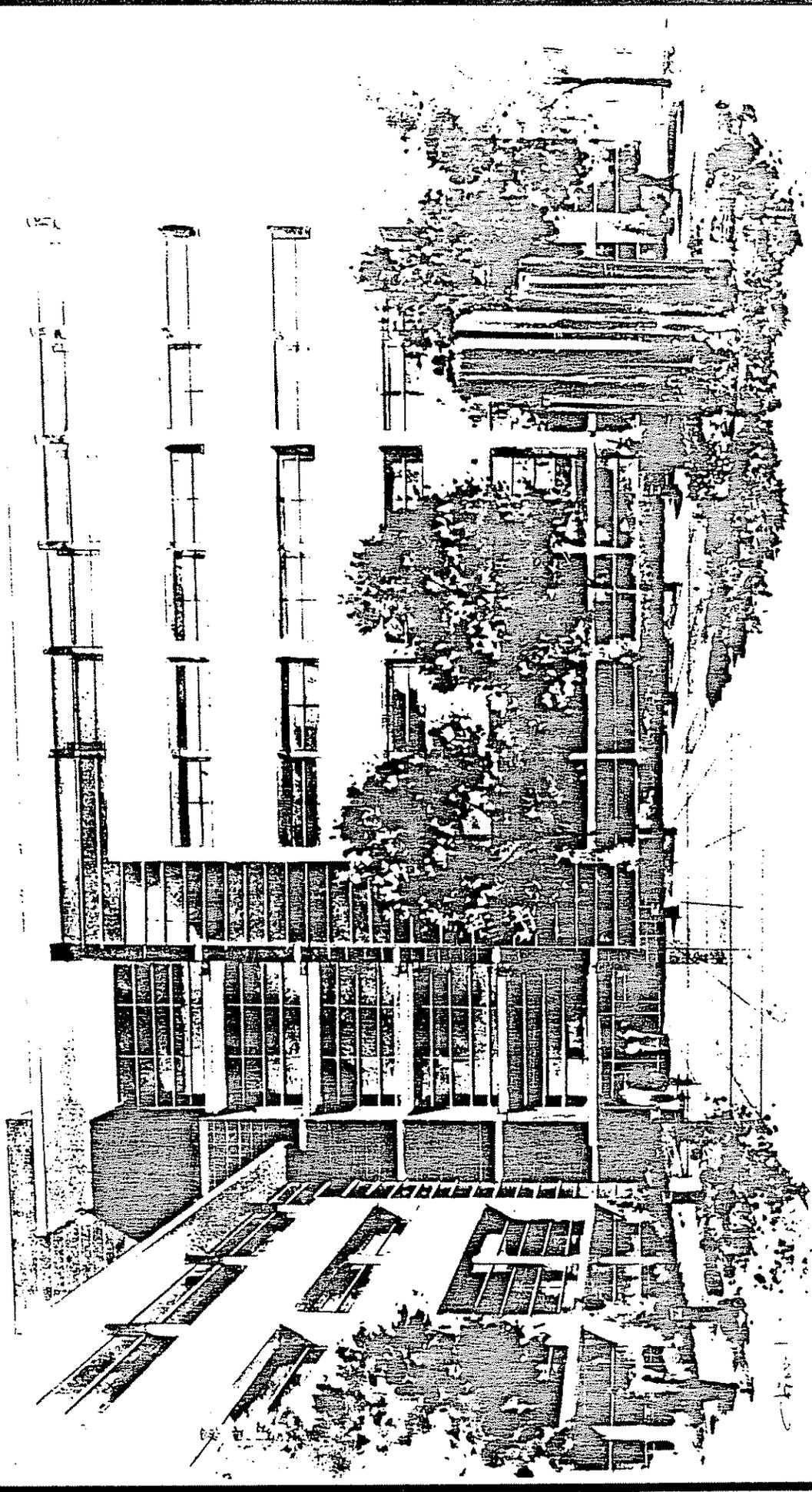
The architectural design of the medical office building would be similar to that of the expanded hospital building. Similar architectural features of the medical office building and the hospital facility would form a contiguous architectural style throughout the site. As shown in Figures 15 and 16, additional treatments have been added to the design of the medical office building to further reduce the visual impact on the surrounding community. These treatments include an integrated planter and water features along the base of the medical office building facing Fifth Avenue and H Street. Street trees approved by the City's Landscape Architect would also be planted along the inner and outer perimeters of the medical office building.

A five-story concrete parking structure (one level underground, one level at street grade and three levels above ground) to be constructed with the ultimate phase of the project would be located in the northwestern portion of the site. Primary access to the parking structure would be from Fifth Avenue with a secondary access point on the east side of the building. As shown in Figure 17, the parking structure has been designed to break up the apparent mass by using similar proportions, materials and colors as the proposed hospital and medical office building. While maintaining its identity as a parking structure, vertical and horizontal elements would be added resulting in reduction of the



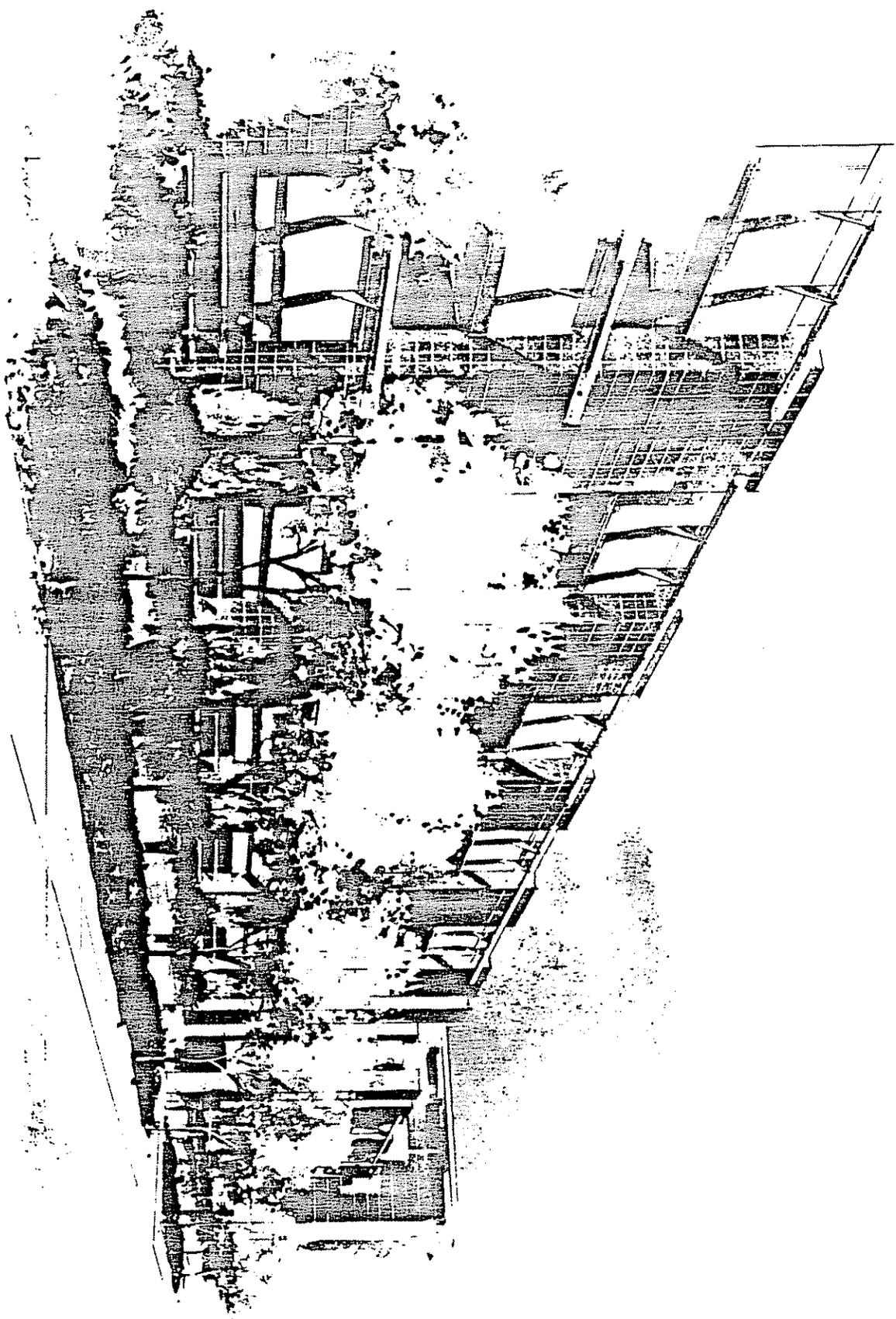
**Scripps Memorial Hospital Expansion
Proposed Medical Office Building - Street View**

**Figure
15**



Scripps Memorial Hospital Expansion
Proposed Medical Office Building - Plaza View

Figure
16



Scripps Memorial Hospital Expansion
Proposed Parking Structure

Figure
17

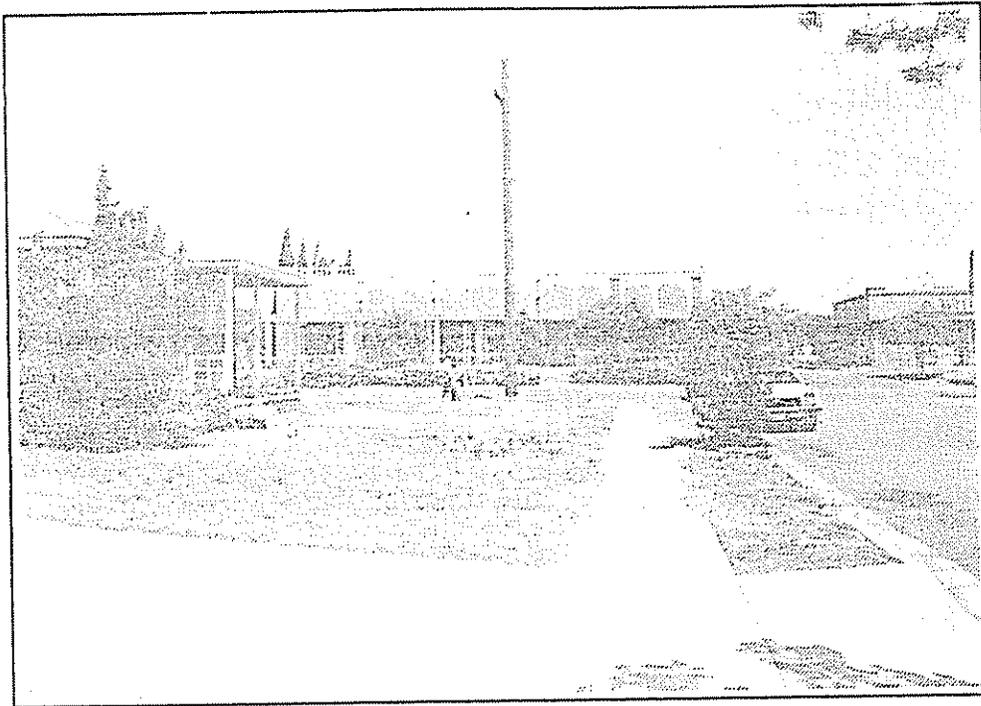
apparent scale of the structure. An integrated planter is also proposed at the base of the parking structure to reduce the apparent height of the structure when viewed from the street. A 25-foot landscaped setback and street trees along the length of the parking structure on Fifth Avenue are also proposed to soften the visual impact of the structure.

The proposed on-site landscape and architectural treatment would improve the existing visual character of the project site. The master plan approach and required design review of both the initial and ultimate phases of hospital development would ensure that the design as currently proposed is carried out. After implementation of these mitigation measures, no significant impacts with respect to on-site visual changes are anticipated.

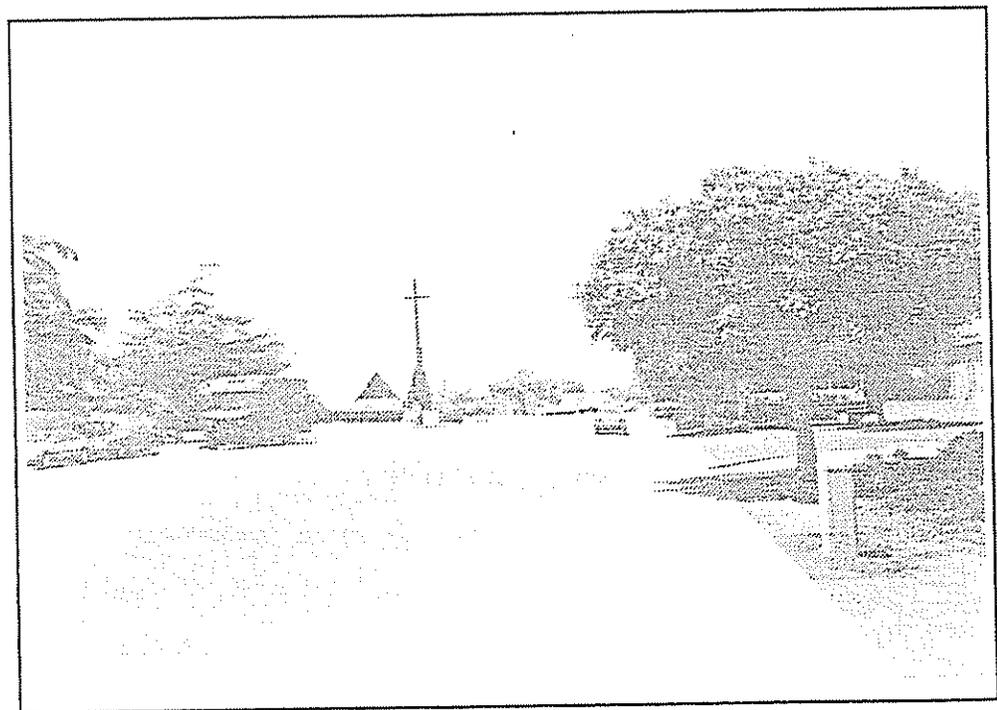
-- Anticipated Off-Site Visual Changes

The project site is currently developed and is located in an existing urban area. In addition to urban development on the project site, existing urban uses in the project area are primarily located along H Street and Fourth Avenue and include the Chula Vista Shopping Center on H Street and Chula Vista Medical Center and apartment buildings along Fourth Avenue. Existing development along Fifth Avenue is generally 1-story with a maximum of 2-stories. The existing urban development is generally low profile with the largest buildings being the existing 4-story hospital building, the medical center and apartment complex and the 2-3 story anchor stores in the Chula Vista Shopping Center. In general, existing buildings with significant mass are well set back from the roadway.

The proposed hospital expansion would introduce more massive structures along H Street and Fifth Avenue than currently exist, particularly the medical office building and the parking structure. The relationship of the proposed hospital development in terms of building form and mass to the existing development in the area is illustrated in Figure 18. Figure 19 shows the anticipated streetscape along H Street and shows the anticipated streetscape along Fifth Avenue. As shown, construction of the parking structure and medical office building would introduce new and larger building forms into the project

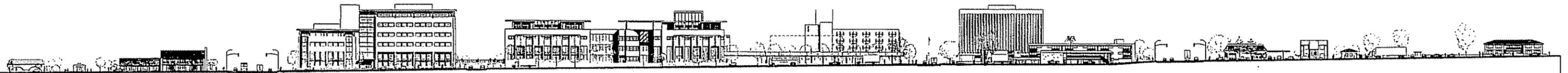


Existing Youth Oriented Facility On Site Adjacent to 5th Avenue



Street Scene 5th Avenue - Northern View

H Street



FIFTH AVENUE PHASE 1 MEDICAL OFFICE BUILDING PHASE ULTIMATE MEDICAL OFFICE BUILDING PHASE ULTIMATE HOSPITAL EXPANSION PHASE 1 HOSPITAL EXPANSION PHASE ULTIMATE HOSPITAL EXPANSION EXISTING HOSPITAL CHULA VISTA MEDICAL CENTER APARTMENTS FOURTH AVENUE

Fifth Avenue



'G' STREET

FUTURE CLASSROOM BUILDING

PARKING STRUCTURE

PHASE 1 MEDICAL OFFICE BUILDING

'H' STREET

Scripps Memorial Hospital Expansion
H Street and Fifth Avenue - Future Streetscapes

area. With the exception of the 6-story medical office building element, which would be set back a minimum of 100 feet from H Street and Fifth Avenue, all building elements would be 4-stories or less, consistent with the existing 4-story hospital building and well within the 100-foot height limit established for the project site. The proposed project would introduce more massive building elements into the project area than currently exist. Although such structures would be consistent with designation of the site as part of the City's urban core, with existing height limit restrictions and with the overall urbanized nature of development along H Street, introduction of these large scale buildings into the existing low profile (1 and 2 story) building environment would be considered a significant impact.

The street tree landscaping along H Street and Fifth Avenue would change with implementation of the proposed project. As previously discussed, landscape plans are proposed as part of the project site which would provide street trees along both H Street and Fifth Avenue. Although some temporary disturbance would occur during construction, sidewalks would remain on both H Street and Fifth Avenue. The primary access to the hospital along East H Street would be opposite the access to the recently renovated Chula Vista Shopping Center. The existing visual character of this area is illustrated in Figure 11. With implementation of the proposed project, a new entry statement would be provided along H Street, consistent with the entry treatment for the Chula Vista Shopping Center. The existing urban/commercial character along H Street would not change significantly with project implementation although landscaping adjacent to the project site would be improved.

As shown in Figure 18, the existing street scene along Fifth Avenue, with its mixture of residential and institutional uses, is somewhat different than that along H Street. Although landscaping adjacent to the project site along Fifth Avenue would be improved with project implementation, a 5-level (one below grade, one at grade and three above grade) parking structure would be introduced as a significant new element to the street scene during the ultimate phase of project development. Development of the 5-level parking structure would be considered a significant visual impact to the surrounding

street scene. The parking structure would be placed in approximately the same location as the existing Farrell's ice cream store shown in Figure 18. The parking structure would be screened by the placement of street trees along Fifth Avenue and would be setback 25-feet from the property line. A planter would be integrated into the base of the parking structure to minimize the height of the structure and horizontal and vertical elements would be incorporated into the design of the parking structure to minimize the height and add texture to the parking structure.

The north end of the parking structure would be located adjacent to the existing Chula Vista Junior High School. Existing and proposed classroom facilities, facing the interior of the junior high school site, are located in the vicinity of the parking structure. The junior high school's athletic and play fields are located at the east of the junior high school site and would not be affected by the proposed parking structure. The primary entrance to the parking structure, off of Fifth Avenue, would be recessed from the street and a safety bar would be provided. These treatments would cue drivers entering and exiting the structure as well as help break-up the overall mass of the structure.

4.2.3 Mitigation Measures

The following measures have been incorporated into the project design to partially mitigate visual impacts.

- All structures will be within the 100-foot height limit established by the City of Chula Vista for the Town Centre II Redevelopment Area;
- The medical office building at the corner of H Street and Fifth Avenue will range from 4-6 stories in height with the 4-story element located along the roadways and the larger, 6-story element set back a minimum of 100-feet from Fifth Avenue and H Street to reduce the apparent bulk and scale of the structure. The 4-story building element will be set back a minimum of 25 feet from Fifth Avenue and 45 feet from H Street.

- New hospital structures will be limited to 3 stories in height and, in general, will be set back a minimum of 180 feet from H Street. An exception is a 3-story administration building which would be constructed on the site of the existing hospital building during the ultimate phase of development. The administration building will be set back 48 feet from H Street.
- The parking structure along Fifth Avenue will be set back a minimum of 25 feet from the roadway. Architectural elements have been incorporated in the design of the parking structure to reduce the apparent scale of the facility.
- The primary entrance to the parking structure, off of Fifth Avenue will be recessed from the street and a safety bar will be provided.
- All project plans shall be subject to review and approval by the City's Design Review Committee (DRC). The DRC reviews projects for consistency with the overall urban design goals of the Chula Vista General Plan and relevant Area Plans.
- Street trees approved by the City's Landscape Architect will be planted along the inner and outer perimeters of the medical office building.

4.2.4 Analysis of Significance

The above mitigation measures would partially mitigate visual impacts to the area, although the introduction of 4-6 story buildings and a 5-level parking structure into the area would not be fully mitigated to below a level of significance.

4.3 TRAFFIC AND PARKING

A traffic analysis for the proposed project was completed by Willdan Associates in July 1990 and revised February 1991. The traffic study is included in Appendix B to this report and is summarized below.

4.3.1 Existing Conditions

The project study area, bounded by H Street, Fifth Avenue, G Street and Fourth Avenue, is well served by the existing freeway and street network. Interstate 5 is located 0.4 miles west of the site, with interchanges at H Street and J Street. Interstate 805 is located approximately 2 miles east of the project site, with the nearest access at H Street.

H Street is classified by the City of Chula Vista's Circulation Element of the General Plan as a six-lane major street between Interstate 5 and Third Avenue and a four-lane major street between Third Avenue and Hilltop Drive. H Street is currently constructed to four lanes divided between I-5 and Third Avenue and four lanes undivided between Third Avenue and I-805. H Street is currently carrying between 23,500 and 30,100 average daily trips (ADT).

G Street is classified as a class II collector (two lanes with two-way center turn lane) and is currently constructed as a two lane undivided street. G Street is currently carrying 6,100 ADT east of Fifth Avenue and 6,400 ADT west of Fifth Avenue.

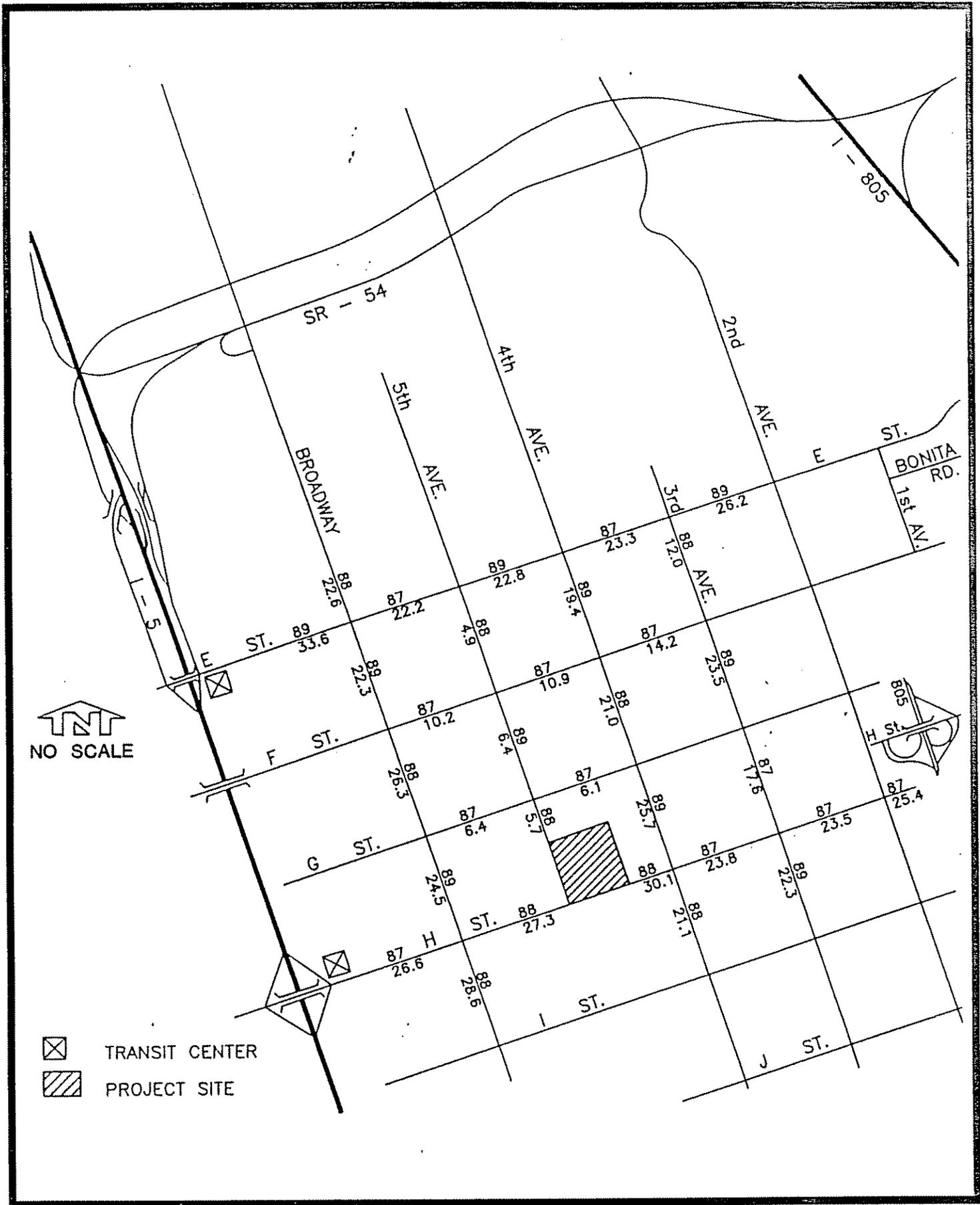
E Street is classified as a four lane major street between Interstate 5 and Broadway and a class I collector (four lanes with two-way center turn lane) between Broadway and Third Avenue. It is currently constructed as a four lane divided street between Interstate 5 and Broadway and a four lane undivided street between Broadway and Third Avenue. E Street is currently carrying 33,600 ADT between Interstate 5 and Broadway and 22,200 ADT between Broadway and Third Avenue.

Fifth Avenue is classified as a class II collector (two lanes with two-way center turn lane) and is currently constructed as a two lane undivided street between E Street and H Street. Fifth Avenue is currently carrying between 4,900 and 6,400 ADT between E Street and H Street.

Broadway is classified as a four lane major street (four lanes, divided) and is currently constructed as a four lane undivided street between E Street and G Street and a four lane divided street between G Street and I Street. Broadway is currently carrying between 22,300 and 28,600 ADT between E Street and I Street.

Fourth Avenue is classified as a class I collector (four lanes with two-way center turn lane) and is currently constructed as a four lane undivided street between E Street and F Street and between H Street and I Street. Also, Fourth Avenue is currently constructed to four lanes divided between E Street and H Street. Fourth Avenue is currently carrying between 19,400 and 25,700 ADT between E Street and I Street. Figure 20 illustrates the most recent traffic count information available for the project vicinity streets.

The traffic analysis for existing conditions and future conditions with project implementation, focuses on both intersection analysis and link volumes on particular streets. Intersections are of particular interest since the level of service at which an intersection operates is an indication of the delay which can be expected on the overall circulation system. Additionally, the intersection analysis is based on peak hour conditions which more accurately reflect the traffic conditions on the street network. Six street segments and 4 intersections were identified as being critical in the traffic analysis. Turning movements were also measured at the 4 intersections and are detailed in the appendix to this EIR. The Notice of Preparation discusses potential impacts on ten signalized intersections in the vicinity of the project including northbound and southbound on ramps to I-805 and I-5 located east and west of the project. After several meetings between the traffic consultant and the City traffic engineer regarding potential traffic impacts associated with this project, it was mutually decided that only the four intersections discussed in this section would be affected by project implementation and no impacts are expected to occur at Interstate Routes 5 and 805 as a result of this project.



**Scripps Memorial Hospital Expansion
Existing ADT'S In Thousands**

**Figure
20**

Current volume/capacity ratios and the levels of service (LOS) at the 4 critical intersections and 6 street segments were calculated. The intersection ratios and LOS were calculated utilizing the Intersection Capacity Utilization (ICU) methodology. Level of Service is a term used to describe prevailing conditions and their effect on traffic. Level of Service (LOS) is a qualitative measure of the effect of such factors as travel speed, travel time, interruptions, freedom to maneuver, safety, driving comfort and convenience. Six levels of service, A through F, have been defined in the Highway Capacity Manual of 1965. Level of Service A describes a condition of free flow, with low traffic volumes and relatively high speeds, while Level of Service F describes forced traffic flow at low speed with volumes below capacity. Existing intersection volumes and detailed ICU calculations are included in Appendix A of this EIR. The current levels of service (LOS) and volume/capacity ratios are listed in Table 2.

As shown on Table 2, all of the intersections are operating at LOS C or better under existing morning and evening peak hours. However, it should be noted that narrow lane widths on H Street west of Fourth Avenue along with turning movements to and from the shopping center south of H Street tend to create side friction and affect capacity in this corridor. Specifically, H Street west of Fourth Avenue has substandard geometrics at this time. The north side of this roadway consists of two 10-foot travel lanes and a 5-foot sidewalk immediately adjacent to an apartment wall. Besides reducing capacity adjacent to the H Street/Fourth Avenue signalized intersection, drivers tend to feel "cramped" and unsure of overall roadway conditions. This situation prohibits the possibility of eastbound to westbound U-turns at Fourth Avenue. The ultimate widening of H Street is an off-site requirement that would affect two properties - an office facility and a residential condominium facility at the corner of Fourth Avenue and H Street. The widening can be accomplished without the demolition of any residential units, however, additional right-of-way would be required resulting in the relocation of an ~~existing sound wall~~ existing low barrier wall which separates parking facilities for the medical office building from H Street. Widening would require the demolition of the existing medical office building along H Street and some of the existing parking area. The existing medical office building is owned by the applicant.

**Table 2
Existing Levels of Service**

Intersection	AM Peak		PM Peak	
	ICU	LOS	ICU	LOS
H Street/Fifth Avenue	0.44	A	0.60	A
H Street/Fourth Avenue	0.50	A	0.78	C
G Street/Fifth Avenue	0.42	A	0.47	A
G Street/Fourth Avenue	0.43	A	0.63	B

4.3.2 Potential Impacts

To evaluate the potential impacts on the surrounding street system, the trips generated by the proposed project were estimated. The existing commercial uses trips were then displaced by the proposed project trips. The proposed project trips were distributed and assigned to the street system, and critical street segment and intersection capacities were evaluated.

The traffic which would result from the redevelopment of the site under the proposed project designation and the existing commercial uses were estimated using accepted trip generation rates and peak hour factors. As shown in Table 3, the existing commercial uses would generate 7,814 ADT with 416 trips occurring during the AM peak hour and 661 trips occurring during the PM peak hours. The proposed project would generate 4,980 ADT under Phase I and a total of 9,015 ADT under cumulative Phases 1 and Ultimate. Therefore, the proposed project would add 1,201 ADT's to the existing traffic with an additional 244 trips occurring during the AM peak and an additional 282 trips occurring during the PM peak. It should be noted that the existing uses are commercial and capture some existing "passerby" trips already on the street network. Therefore, instead of a net decrease in traffic under Phase I expansion, there would likely be no measurable change in trips generated from the project site.

Short Term Impacts

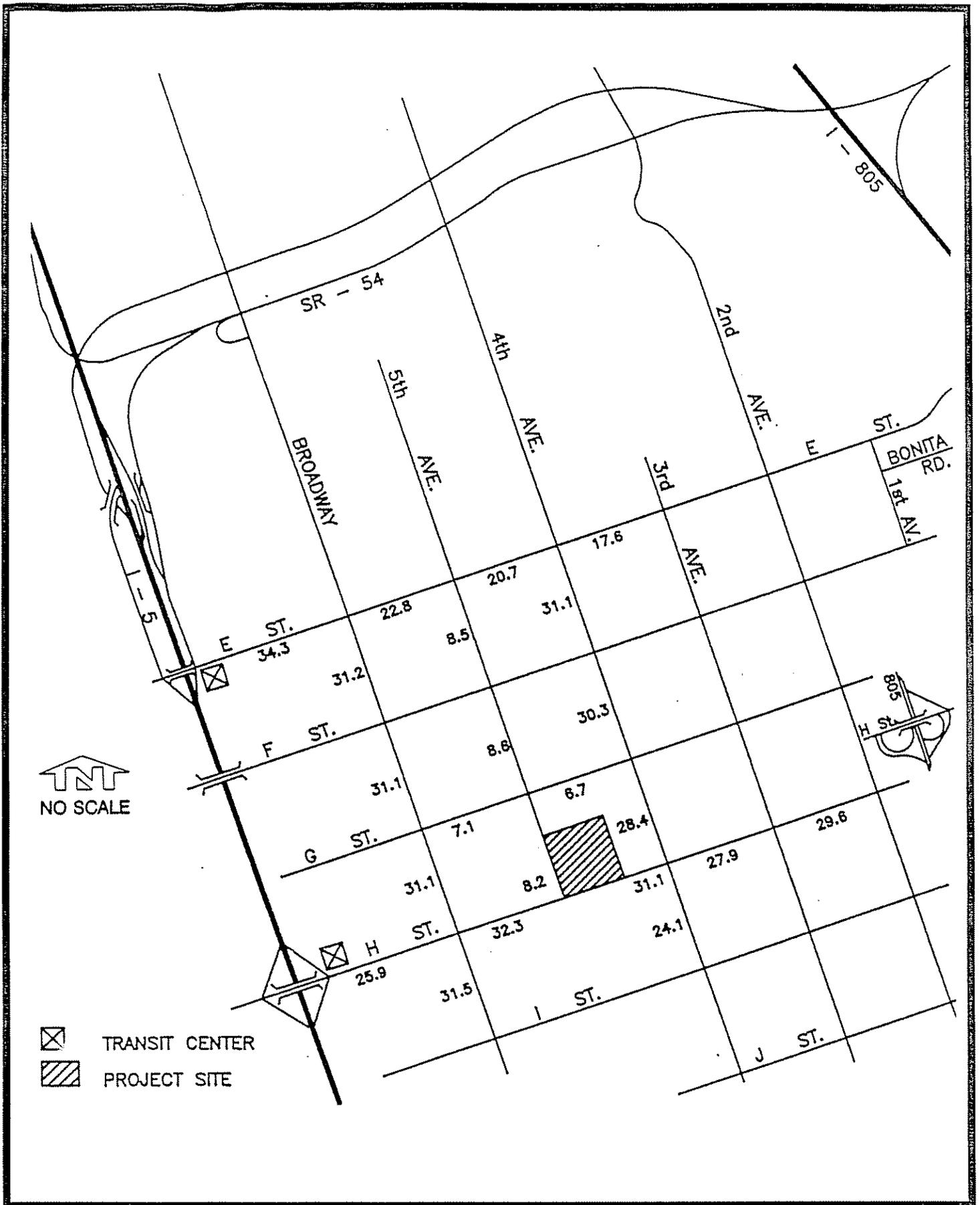
It is anticipated that the proposed project would be constructed in phases. The ultimate buildout is expected in ten to fifteen years. This analysis assumes the Phase I expansion as the short term condition. The short term cumulative condition is analyzed under year 1995 conditions referencing the year 1995 SANDAG Series 7 forecast with Eastern Territories "approved projects" as described in the travel forecast prepared by Willdan Associates and included in the east Chula Vista Transportation Phasing Plan (ECVTPP). The short term impacts take into account the completion of State Route 54.

Street Segment Analysis

Figure 21 shows the year 1995 with Phase I expansion daily traffic volumes. H Street is projected to operate at or slightly above the City of Chula Vista's recommended maximum LOS C daily traffic volumes on most segments. The exception is east of Third Avenue where H Street is forecast to carry daily volumes in excess of the LOS C recommended volumes. Fifth Avenue is projected to operate slightly above the City of Chula Vista's recommended maximum LOS C daily volumes. Fifth Avenue between the project parking structure access and H Street is projected to carry daily volumes that slightly exceed the LOS C recommended volumes. This section of Fifth Avenue will be improved to its ultimate classification along the project frontage.

E Street is projected to decrease from existing traffic levels and carry volumes within or slightly above the LOS C recommended volumes. This primarily results from the opening of State Route 54 between I-5 and I-805.

Broadway is projected to continue to carry volumes that slightly exceed the LOS C recommended volumes between E Street and I Street. G Street is projected to operate within the LOS C recommended volumes.



Scripps Memorial Hospital Expansion
 Year 1995 + Phase I Expansion ADT's

Figure
 21

**Table 3
Trip Generation (Existing Land Use)**

Existing Land Use	Intensity	Daily Trip Rate	Average Daily Trips	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Fiesta Cinema	9,350 SF	80/1000 SF	748	0.3	-	-	8	42	18
Farrell's	5,600 SF	300/1000 SF	1,680	8	67	67	6	60	40
Readicare Cnt (Med Ofc)	3,250 SF	50/1000 SF	163	6	8	2	10	5	11
First Interstate Bank (w/drive through)	6,750 SF	200/1000 SF	1,350	5	41	27	10	68	68
Captain Kidd's	1,950 SF	300/1000 SF	585	8	23	23	6	21	14
Arby's	2,450 SF	700/1000 SF	1,715	4	41	27	8	69	69
Express Gasoline	9 pumps	130/pump	1,170	6	35	35	12	70	70
Indoor Swap Meet ¹	80,600 SF	5/1000 SF	403	5	10	10	9	18	18
TOTAL			7,814		225	191		353	308

¹ Warehouse Trip Generation rate was used.

Intersection Analysis

Table 4 summarizes the analysis of the level of service for the 4 intersections included in the traffic study. As shown on Table 4, all intersections would continue to operate at LOS A during the morning peak hour. During the evening peak hour, however, the intersections of H Street with Fourth Avenue, would operate at LOS D. LOS D is acceptable for 1 hour during peak traffic according to the City of Chula Vista Threshold Standards. If a third lane on the north side of H Street is provided along the project frontage, the operations at the H Street/Fourth Avenue intersection would improve to better than LOS D by reducing downstream traffic friction.

Intersection	AM Peak		PM Peak	
	ICU	LOS	ICU	LOS
H Street/Fifth Avenue	0.44	A	0.70	B
H Street/Fourth Avenue	0.56	A	0.86	D
G Street/Fifth Avenue	0.42	A	0.50	A
G Street/Fourth Avenue	0.47	A	0.72	C

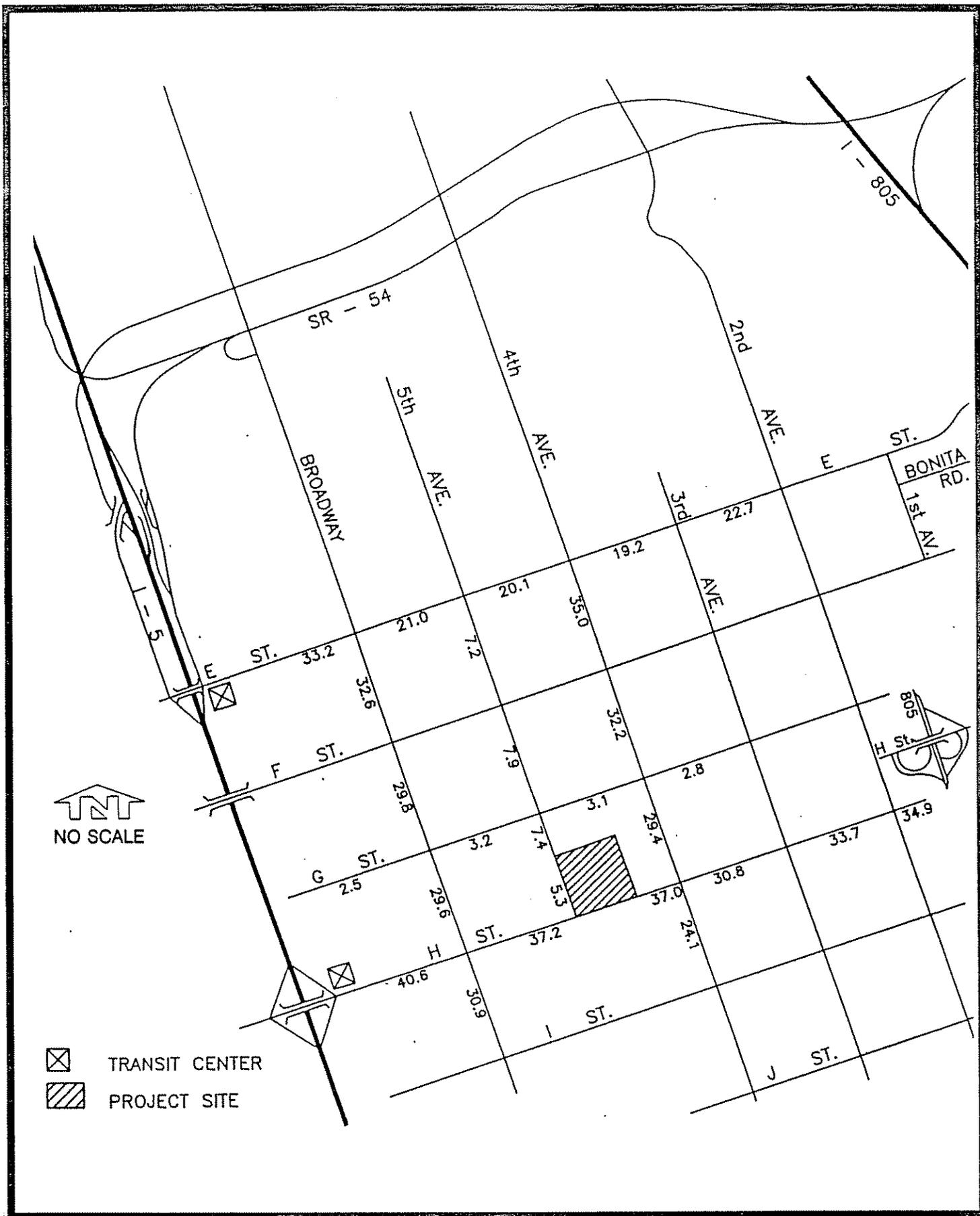
-- Long Term Impacts (buildout)

Street Segment Analysis

In order to evaluate the long term impacts associated with the project, Willdan Associates used the City of Chula Vista General Plan Scenario 4 buildout travel forecasts and traffic counts for the proposed Chula Vista Mall Expansion and the Rohr Industries project. According to the buildout trip generation for the zone containing the Scripps Hospital,

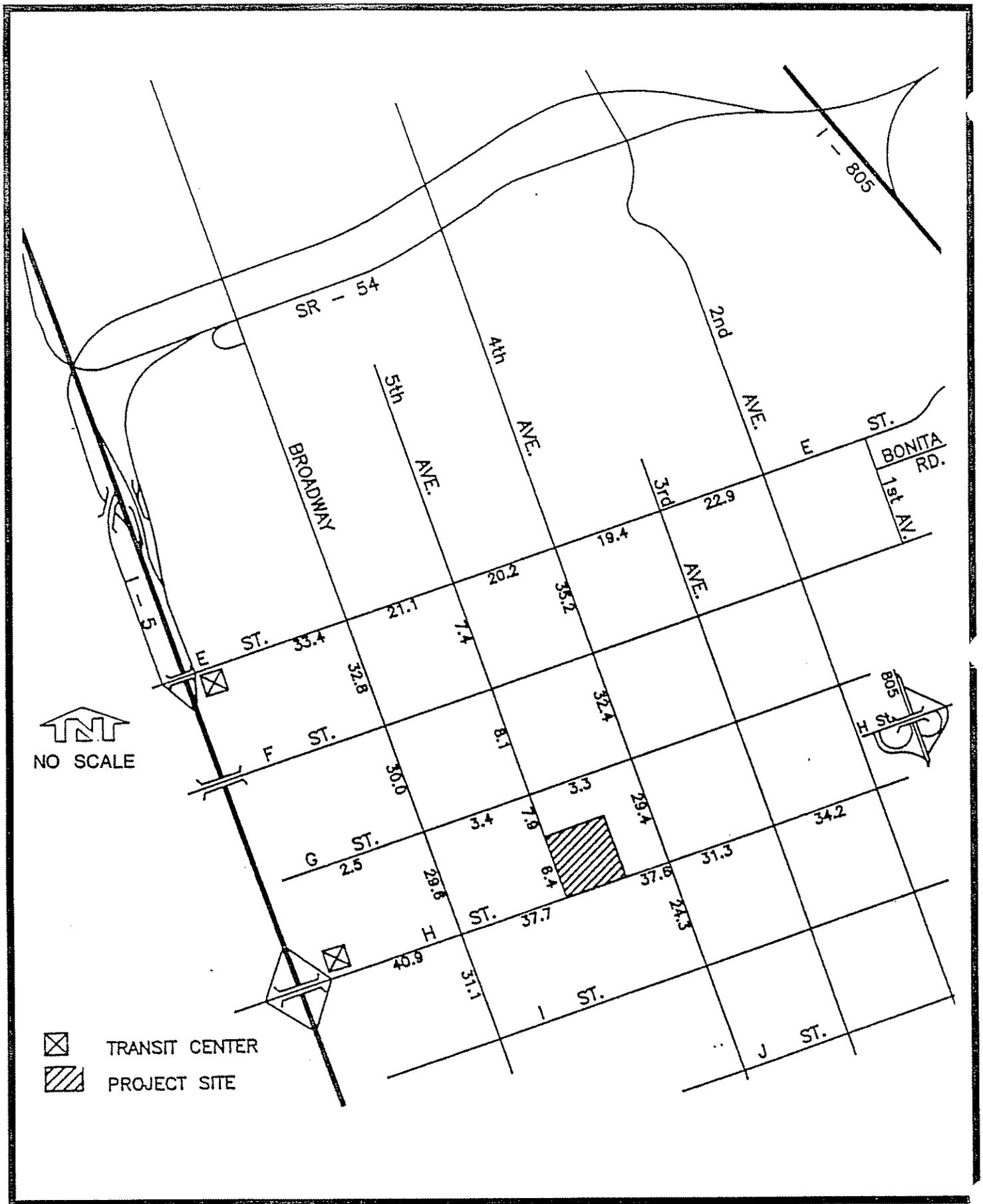
there were 7,500 ADT assumed for the project uses. Since the proposed project is estimated to generate approximately 9,000 ADT under ultimate expansion, this yields a trip increase of 1,500 ADT over General Plan trip estimates for the project site. Figures 22 and 23 present the buildout travel forecast average daily trips on the street system surrounding the proposed project for General Plan and proposed project conditions, respectively. Most street segments in the project vicinity are projected to operate at LOS C or better under both the General Plan and proposed project conditions. Exceptions include:

- H Street between Interstate 5 and Broadway is projected to carry daily volumes in excess of 40,000 ADT under both General Plan and proposed project conditions.
- E Street between Interstate 5 and Broadway is projected to carry daily volumes in excess of 30,000 ADT under both General Plan and proposed project conditions.
- Broadway between E Street and F Street and between H Street and I Street is projected to carry volumes in excess of 30,000 ADT under both General Plan and proposed project conditions. Also, Broadway is projected to carry volumes that slightly exceed 30,000 ADT between F Street and G Street under proposed project conditions.
- Fourth Avenue between E Street and I Street is projected to carry daily volumes in excess of 22,000 ADT under both General Plan and proposed project conditions.



**Scripps Memorial Hospital Expansion
Buildout Volumes (General Plan)**

**Figure
22**



**Scripps Memorial Hospital Expansion
Buildout Volumes (Proposed Project)**

**Figure
23**

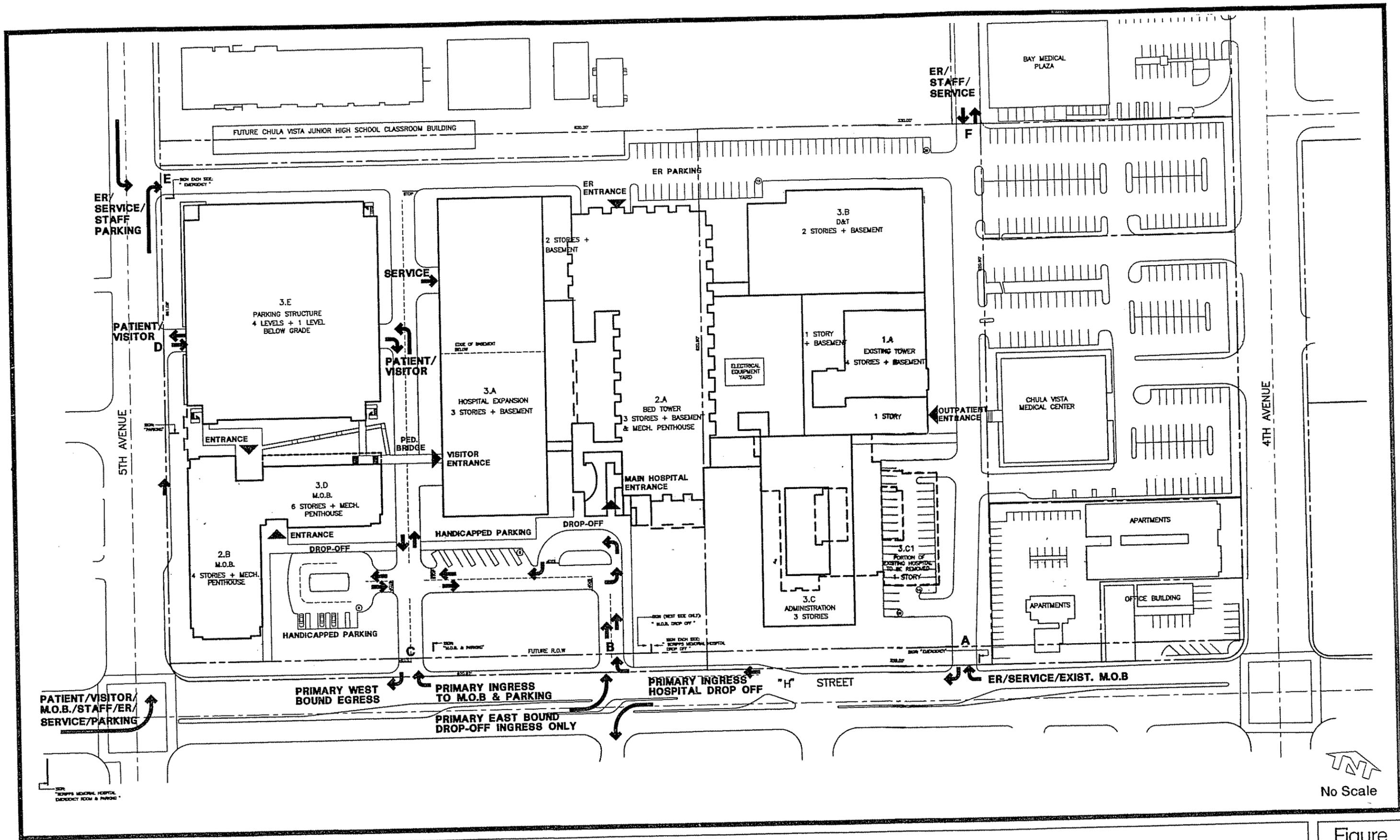
-- Access Parking and Internal Circulation

The Scripps Hospital Expansion project preliminary site plan indicates several access points to H Street, Fifth Avenue and G Street (see Figure 3). This plan has been revised to address the traffic related issues identified by the City Traffic Engineer.

As shown on Figure 24, the primary west access would be provided from H Street via Fifth Avenue. Driveway D would be patient/visitor access only to the parking structure and driveway E would be emergency room/service/staff access only to the parking structure and emergency room parking. As a worst case scenario, 70 percent of the project peak hour trips were assumed to take access from driveway D (based on the ratio of parking structure spaces to total project parking spaces). This access is projected to operate at LOS A and D during the morning and evening peak hours, respectively, for the driveway approach left turning vehicles. Additional access to the parking structure, however, is provided from driveway C and E.

Driveway A is a right in-right out only along H Street serving the emergency room/service and existing medical office building. Driveway B is an ingress only along H Street serving the hospital drop off area. ~~It may be necessary to offset this driveway to the west of the shopping center driveway on the southside to provide sufficient turning radius for eastbound motorists turning left into the hospital.~~ The center median along H Street in the vicinity of Driveway B should be designed to accommodate left-turn access to both the project site and the Chula Vista Shopping Center as shown in Figure 24. Driveway C is a right in-right out only along H Street serving the medical office building drop off area and the parking structure. This driveway serves as the primary ingress to the parking structure from the east and west bound egress from the parking structure.

Driveway F is a north access from G Street serving the Emergency Room/staff and service parking. According to the hospital staff, the hospital experiences 450-600 emergency vehicle trip ends per month. This averages at approximately 15-20 trip ends per day. G Street between Broadway and Fourth Avenue is projected to operate at LOS C or better under existing plus project conditions. Additional access to the staff and



Scripps Memorial Hospital Expansion
 Access Parking and Internal Circulation

TNT
 No Scale

Figure
 24

service parking and emergency room would be provided from driveways A and E. Therefore, no significant traffic effect on G Street is projected with or without driveway F access.

-- Alternative Access to Fourth Avenue

An additional access directly to Fourth Avenue was discussed with the City of Chula Vista Traffic Engineer. This would allow access to four different streets and tend to spread turning movements out more evenly to and from the project. This would entail a joint access agreement with the existing medical office uses on the west side of Fourth Avenue and the elimination of existing parking spaces.

This access alternative would most likely impact the H Street/Fourth Avenue signalized intersection since it would redistribute traffic north along Fourth Avenue instead of west along H Street. An analysis for the H Street/Fourth Avenue intersection was performed under 1995 plus Phase I conditions with a project access to Fourth Avenue under AM and PM peak hour conditions. Fifty percent of traffic from the south and east was assigned to this access and resulting peak hour traffic re-routed at the above mentioned intersection. The ICU analysis indicated a slight degradation from 0.56 to 0.57 during the AM peak hour and 0.86 to 0.88 during the PM peak hour. ~~Since the level of service does not improve, the additional access at Fourth Avenue may not prove to be advantageous from a cost-benefit standpoint.~~

-- Construction Traffic

Although grading would be less and balance on-site with Phase I of the project, grading associated with the basements and parking structure in Phase Ultimate would require exporting of soil from the site. Temporary construction traffic may be generated from the site as exporting occurs from the site. In the absence of control measures, temporary traffic congestion could occur in the surrounding area.

4.3.3 Mitigation Measures

To mitigate the Scripps Hospital expansion project traffic impacts to a level of insignificance, the following actions are recommended:

-- Phase I - Mitigation

1. Dedicate ultimate right-of-way along Fifth Avenue along the project frontage and construct a northbound access lane.
2. Dedicate ultimate right-of-way along "H" Street along the project frontage and construct an additional westbound lane.
3. Construct raised median along "H" Street between existing improvements at Fourth Avenue and Fifth Avenue as shown on Figure 3.
4. Pay traffic signal impact fees to the City of Chula Vista in accordance with City policy for upgrading of traffic signals within the western portion of Chula Vista resulting from increasing traffic volumes.
5. Prepare a construction traffic control program to the satisfaction of the Chula Vista Public Works Director.

-- Phase II - Ultimate Mitigation

Prior to occupancy of the Phase Ultimate medical office building which generates 3,200 ADT, dedicate sufficient room and widen the north side of "H" Street between Fourth Avenue and the project to provide a continuous third westbound lane between Fourth Avenue and Fifth Avenue.

4.3.4 Analysis of Significance

Implementation of the proposed project would increase the number of trips on the streets located within the project area, most notably on H Street. Impacts associated with project

implementation would be mitigated to below a level of significance with implementation of the above measures.

4.4 NOISE ANALYSIS

A noise analysis was completed for the proposed expansion of the Scripps Memorial Hospital Expansion by San Diego Acoustics, Inc. The full report is included in Appendix C of this EIR and is summarized below.

The noise study was conducted to show the change in community noise levels which are likely to result from implementation of the proposed project.

4.4.1 Existing Conditions

-- Existing Ambient Noise Levels

Existing noise conditions were established through noise measurements of automotive traffic on Fifth Avenue and H Street. Noise levels were measured between the hours of 10 AM and 11 AM to calibrate the noise model for the noise study. The noise levels were deliberately measured during off-peak hours to get a stable reading. Peak hour noise level measurements tend to read a lot of background noise with diminished accuracy with respect to establishing an ambient noise level. Passing vehicles were counted simultaneously with the noise measurements so that an adjustment could be made if the passing traffic varied from the average noted by the City. The measured data is shown in Table 5. As shown on Table 5, existing ambient noise levels in the study area range from 64-68 dB(A).

Street	Leq	Lmax	Lmin	H.T.	Veh/Hr.
H Street	68	82	55	4%	1,508
Fifth Street	64	78	48	0%	382

Note: Distance of microphone from center of street; H Street, 61 feet; Fifth Street, 30 feet.

-- Regulatory Framework

The Chula Vista City Code places limits upon the originator of noise as a function of the adjoining land use category. These categories include residential, commercial and industrial uses. The only directly adjacent neighbor (to the north) is the Chula Vista Junior High School. Schools are not covered by the Chula Vista Noise Ordinance.

As an explicit criteria does not exist, a logical reference criteria was sought and selected. The State of California has set a limit on traffic noise permitted for elementary and secondary schools, Section 216 of the Streets and Highways Code. In essence, this Code limits the noise which may be produced inside a classroom to 55 dB(A) L_{10} or 52 dB(A) L_{eq} . L_{10} refers to the level which is exceeded 10% of the time. This usually means the peak hour level. It is also generally considered that the exterior sound level is reduced by 10 dB when it arrives through an open window. Thus, a reasonable limit for peak hour noise outside the window of a school room can be 65 dB(A). This limit is used as the criteria for this project with respect to the neighboring school.

4.4.2 Potential Impacts

Implementation of the proposed project would result in changes to the existing noise levels from increased street traffic, emergency vehicle traffic, parking facility noise and a potential from stationary HVAC and standby power sources for the hospital. The project does not anticipate the use of a heliport on-site for emergency access to the site, therefore noise impacts associated with helicopter traffic is not included in this analysis.

-- Street Traffic

Traffic noise levels were calculated on the basis of the predicted volumes at "buildout" resulting from the project and all other outside factors (Willdan Traffic Analysis, July

1990). Table 6 illustrates the present and "buildout volumes with and without project implementation.

Table 6 Present and Build Out Traffic Volumes for Project Streets			
Street	Average Daily Trips - ADT		
	Present	At Build Out due to:	
		Community	Community + Project
Fifth N*	5,700	7,400	9,500
S*	5,700	5,300	10,100
H	30,100	37,000	39,700
G	6,100	3,100	4,000

Note: N* or S* means, north or south of the project.

Changes in traffic volume result in changes in traffic noise. Therefore, the future noise levels would increase adjacent to Fifth Avenue and H Street and decrease on G Street.

Between G and H Streets, on Fifth Avenue, noise levels would increase by 2.2 and 2.5 dB to the north and to the south of the project, respectively. Between Fourth and Fifth Avenue on H Street and G Street noise levels would increase by 1.2 dB and decrease by 1.8 dB, respectively. This increase is not regarded as significant in the context of existing ambient noise levels.

-- Parking Facility

The primary parking for the project would be located along Fifth Avenue. An initial at grade parking lot would be built to handle approximately 352 vehicles. The second phase of construction would replace this lot with a 5 level parking garage of 775 spaces (one level

would be below ground). Only the latter facility was analyzed as the volume of traffic would be much greater with a much higher potential for noise and an additional, closer, Junior High school building would likely be in existence at that time.

The parking garage was analyzed on the basis of peak hour traffic movement and the assumption that all four sides of the structure would be essentially "open." In addition, a staff and service road would exist to the north of the garage, south of the Chula Vista Junior High School property. The effect of this traffic was also taken into account. The distance from the parking garage to the face of the new school building would be 57 feet. The distance from the center of the service road to the face of the future school building would be 31 feet.

The analysis is based on the fact that an average automobile traveling at low speed (6 mph) produces a peak noise level of 70 dB(A) while passing at a distance of 10 feet. Conservatively, a passing vehicle would produce a single event level (SEL) of 78.3 dB(A). This value of SEL and the Willdan estimate of 192 vehicles in and 468 vehicles out during the maximum PM peak hour was used to determine the maximum hourly noise which would reach the face of the nearest building, the Junior High School.

The total effect of the parking garage peak hour noise would be a level of 65 L_{eq} , at the face of the future classroom building. Basement parking influence was not included in the assumptions since this level would not be open on any side.

-- Emergency Vehicles

The subject of emergency vehicles was examined. Approximately 15-20 emergency trips per day are expected. Of these emergency trips, approximately one per day is expected to use the siren. In all cases, the siren is turned off as the emergency vehicle enters the hospital site. Three entry points are available and an equal use of each is expected. As

only one "siren trip" per day is expected, it would not appreciably add to the average hourly noise level and was not included in the calculations for any street.

-- HVAC and Standby Power

HVAC units would be located on the roof of the new buildings. They would be at least 220 feet from the nearest unit location to the nearest property line to the north. Noise levels from such units depend upon the size, type and manufacturer. None of this information has been defined at this time. The expanded hospital would utilize air handlers and return air units in the range of 7 to 10 H.P. and 10,000 to 20,000 CFM. Two air handlers and two return fans, of this type, would produce 92 PWL dB(A), or at a distance of 220 feet would result in a sound pressure level of 48 dB(A). Ten such pairs would produce 55 dB(A) at 220 feet.

The emergency power source would be two 600 KW generators driven by a diesel engine. Again, these items have not been further defined. A 1200 KW generator would require an input of at least 1600 HP (100% efficiency). A 400 HP diesel engine produces approximately 83 dB(A) at a distance of 50 feet. Four would produce 89 dB(A) at the same distance. At 220 feet to the property line, the noise level would be 76 dB(A).

The major power transformer has not been defined but a typical size might be 12 KVA at 480 volts. Such a transformer might produce a level of 68 dB(A) at a distance of 1 meter. This might be disturbing if it were located on the property line.

4.4.3 Mitigation Measures

The remaining HVAC and standby power equipment should be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The planned enclosure for the standby power unit will provide the necessary noise reduction

depending upon the details of construction. Implementation of this measure would enable the proposed project to mitigate noise impacts to below a level of significance.

4.4.4 Analysis of Significance

The proposed project would be in conformance with the utilized State of California noise guidelines for noise impacts on schools. Future traffic noise levels would increase by 2.2 to 2.5 dB on Fifth Avenue, 1 dB on H Street and decrease by 2 dB on G Street. The project is only partially responsible for these changes, and this increase is not considered significant.

4.5 HEALTH

Two health issues are addressed in this EIR- potential impacts associated with removal of the existing gas station located on the expansion portion of the site and potential health impacts associated with disposal of infectious waste by the hospital.

4.5.1 Hazardous Waste

4.5.1.1 Existing Conditions

A limited hazardous waste assessment for the project was prepared by Robert Prater Associates in January, 1990. This study is summarized below and included as Appendix D to this EIR. The subject site is situated in the coastal plains of San Diego County roughly one mile east of San Diego Bay. The property is located on a very flat lying ancient marine wave-cut platform known as the Nestor Terrace. The natural drainage in the area is poorly developed generally flowing from east to west. Drainage in the immediate area is controlled by storm drain systems. On-site drainage consists of sheet flow toward the site perimeters.

The site itself includes a large single story main building occupied by a roller skate rink and indoor swap meet. Several small businesses also occupy the site including a movie theater, bank, medical clinic and convenience restaurants. An Express Gas service station is located on the southeast corner of the site. Three underground storage tanks and associated piping are located on the east side of the station. The tanks each have a capacity of 8,000 gallons and contain regular unleaded gasoline, premium unleaded gasoline and diesel. A 550 gallon waste oil tank is located on the west side of the service station. According to gas station personnel, the tank is empty and not in use at this time. No other apparent hazardous materials use or storage is present on-site.

With the presence of underground storage tanks at the gas station, work on-site to assess hazardous waste impacts included sub surface exploration and analytical testing. Vapor

monitoring was also conducted during the drilling operation to help evaluate the presence of petroleum hydrocarbons. No gasoline odor or vapor readings were noted in any of the borings. Additionally, no visible evidence of petro hydrocarbon product was observed in any of the borings.

Due to past agricultural usage on-site, two representative samples of the near surface soils were obtained for testing during our geotechnical subsurface investigation. These samples were tested for pesticides in common use prior to 1968. The test results indicated no detectable levels of pesticides, PCB's or chlorinated herbicides.

4.5.1.2 Potential Impacts

Based on the above described study, there is no evidence of existing hazardous waste contamination on-site. Based on the previous agricultural usage of the site there is a possibility of residual pesticides and herbicides being present on the property. Analytical testing of representative samples of the near surface soils indicated less than detectable levels of pesticides, PCB's and herbicides. The overall potential for pesticides and herbicides impacting the site is expected to be minimal. The primary potential source of hazardous material contamination on-site is from leaking underground storage tanks and associated piping at the Express Gas service station. Subsurface testing and analytical testing did not reveal evidence of leakage. The 550 gallon waste oil tank on-site is reportedly empty and not in use. Based on these investigations, there is no evidence of significant leakage on-site. An underground storage tank (UST) removal plan is being prepared for removal of the waste oil tank and the two underground storage tanks in conjunction with engineering plans for the project to eliminate any potential impacts from hazardous waste contamination. This UST removal plan would include contingency measures for the waste oil tank in case it is not actually empty as has been determined from preliminary on-site investigations or if leaking has occurred from the underground storage tank that was not detected with the subsurface investigation.

With implementation of the proposed project, demolition of existing structures would occur on the 8.9-acre expansion portion of the site. There is a potential for asbestos occurring in the existing structures that would be demolished. Prior to any demolition taking place on-site, an environmental audit would be performed by an accredited asbestos inspector to determine if asbestos occurs on-site. If the testing is positive, the asbestos would be removed from the site prior to demolition of the structures.

4.5.1.3 Mitigation Measures

To reduce any potential impacts associated with hazardous waste contamination, preparation of a UST removal plan prepared in accordance with State DHS and County Hazardous Materials Management Division is required prior to the issuance of grading permits. This plan will include contingency measures in case the waste oil tank is not empty as determined by on-site investigations, or if previously undetected leaking has occurred from the underground storage tank. An environmental audit would be performed on all structures scheduled to be demolished to determine if asbestos occurs on-site. If asbestos is located on-site, it would be safely moved prior to demolition of the structures.

4.5.1.4 Analysis of Significance

No significant impacts are expected to occur with respect to hazardous waste handling or asbestos removal with project implementation.

4.5.2 Infectious Waste

4.5.2.1 Existing Conditions

Scripps Memorial Hospital has an established procedural manual for the handling and disposal of all infectious waste. This is in conformance with the Health and Safety Section, Title 22 of

the California Administration Code that states that a written hospital infection control program for the surveillance, prevention and control of infectious waste shall be adopted and implemented for every hospital facility. The program shall include policies and procedures that:

- Define and require methods to handle all patients , all blood and body fluids and all materials that are soiled with blood and/or body fluids from all patients. The methods prescribed shall be designed to reduce the risk of transmission of potentially infectious etiologic agents from patient to patient and between patient and health care worker. The methods shall include handwashing, the use of gloves, the use of other barriers, the handling of needles and the disposal of materials that are soiled with or contain blood and/or body fluids. Scripps Memorial Hospital utilizes the services of a licensed infectious waste disposal company to take the infectious waste from the hospital to a landfill site that allows infectious waste. Pick-ups at the hospital occur daily or two to three times a week.

- Define practices to reduce the risk of transmission of infectious etiologic agents including the assignment of rooms and/or roommates.

- Provide for and document the education of all personnel.
 - o Each new employee shall receive training appropriate to his/her job classification and work activities to acquaint him/her with infection control policies and procedures of the health care facility.

 - o Training material shall be kept current and conform to new information pertaining to the prevention and control of infectious diseases. Revised training material shall be presented to all health care workers.

- Provide a plan for the surveillance and control of nosocomial infections including procedures for the investigation and management of outbreaks.

- Define the equipment, instruments, utensils and disposable materials that are to be defined as biohazardous.
- The infection surveillance and prevention control program shall be vested in a multi-disciplinary committee which shall include representatives from the medical staff, administration, nursing department and infection control personnel.
- Hospitals having a licensed bed capacity of 200 or more shall have a full-time infection control employee who shall coordinate the activities of the program.

4.5.2.2 Potential Impacts

With the additional square footage that would be added with hospital expansion, including the addition of 99 hospital beds, it is anticipated that the amount of infectious waste produced by the hospital facility would also increase. Scripps Memorial Hospital would update the hospital's written infection control program to include the additional square footage of the expansion portion of the hospital. The hospital would adjust the infectious waste pick-up service as necessary to accommodate any additional infectious waste that may be produced with the expansion of the hospital.

4.5.2.3 Mitigation Measures

Scripps Memorial Hospitals, including the Chula Vista Hospital, has an established infectious waste control program. A copy of the program is included as Appendix E to this document. Upon project approval, the infectious waste control program for the Chula Vista Hospital will be updated to reflect the approved hospital design and any changes to the hospital's infectious waste disposal schedule. An inspector from the County's Hazardous Materials Management Division will inspect the hospital's revised program annually to ensure compliance with County Health Department standards.

4.5.2.4 Analysis of Significance

Potential impacts will be mitigated to a level below significance by implementation of the proposed mitigation.

4.6 AIR QUALITY

4.6.1 Existing Conditions

-- Air Quality Management

Ambient Air Quality Standards represent the maximum level of background pollution considered safe. The Federal Clean Air Act Amendment of 1970 first established national Ambient Air Quality Standards (AAQS) and the State of California subsequently established its own air quality standards. The management of air quality within the San Diego Air Basin falls within the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB).

The SDAPCD is responsible for the following tasks as they relate to the San Diego Air Basin: air pollution monitoring; emissions inventorying; meteorological analysis; operation of air quality models; and the investigation, implementation and enforcement of fixed source technological controls. The Air Resources Board is the State agency responsible for compliance with the federal and state air quality standards, setting mobile source emission standards, and establishing toxic emission standards. The ARB initiated the State Implementation Plan to achieve and maintain these standards.

The 1982 State Implementation Plan (SIP) called for the attainment of all AAQS's within each of the state districts by 1987. The Environmental Protection Agency (EPA) then proposed a policy to address the districts which did not meet the standards by 1987. California received an extension to beyond 1987 for attainment of the National AAQS's for ozone and carbon monoxide. The San Diego Region is presently a non-attainment area (federal standards) for carbon monoxide in the western half of the region (specifically downtown San Diego and Escondido) and the region has continued to not meet the standard for ozone. Ozone remains the major pollutant problem in San Diego. The SIP revisions for 1982 and 1987 have, therefore, concentrated on expanding proven, reasonably-available

air pollution control measures. The San Diego Air Pollution Control District has implemented all the control measures that were identified in the 1987 SIP.

Revisions to the California Clean Air Act were approved in the fall of 1988. This act calls for each district to comply with the State AAQS's by the earliest practicable time. The Act further requires each district to develop an Air Quality Management Plan. The San Diego District is identified as a transported pollution problem area. Therefore, the district will be required to submit the Air Quality Management Plan to the State ARB by July 1, 1991. The new State Clean Air Act requires all development projects to be evaluated relative to "New Source Review" thresholds.

-- Monitored Air Quality

The San Diego Air Pollution Control District (SDAPCD) maintains eight air quality monitoring stations throughout the San Diego Air Basin. The stations monitor the surrounding air for the presence of: ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), PM-10, non-methane hydrocarbons (NMHS) and lead (Pb). These are the pollutants for which the State and Federal governments have established ambient air quality standards and, in some cases, episode criteria. Meteorological data are also recorded at these stations.

The San Diego Air Basin has been designated as a non-attainment area for O₃, and the western two thirds of the basin, which includes the project site, is a non-attainment area for CO, NO₂ and PM-10 (i.e., pollutant levels are interpreted to exceed Federal air pollution standards and are expected to continue to do so). The region has not violated the CO standard for the last five years and redesignation to attainment status is under review by the EPA at this time.

According to SDAPCD, the O₃ standard in the San Diego region was exceeded on 39 days in 1990, a decrease of 16 days when compared with 1989. The State smog index standard (9 ppm of ozone or 75 PSI [pollution standards index]) was exceeded on 139 days in 1990,

down from 158 days in 1989. The State Standard for CO was exceeded on one day in 1990, compared to five days in 1989. San Diego met State standards for NO₂ and SO₂ in 1990 along with Federal standards for CO, NO₂, SO₂, PM-10 and lead. The improved air quality in 1990 reflected some improvements in controlling pollution along with more favorable weather conditions with fewer Santa Anas (SDAPCD, 1991).

The closest APCD monitoring station to the project site is located approximately 1.5 miles east of the site at 80 East J Street. Measurements from the Chula Vista monitoring station are compared with Federal and State Air Quality Standards which have been established in order to protect public health safety and welfare. Data collected from this station reveals that the federal ozone standard was exceeded on 7 days in 1989. The Chula Vista monitoring station has also recorded annual averages for NO₂, SO₂ and PM-10. Table 7 summarizes the air quality at the Chula Vista monitoring station from 1985-1989. As shown, air quality in Chula Vista is generally good with O₃ being the primary pollutant of concern. Federal and State ambient air quality standards are presented in Table 8.

Pollutant	Days Exceeding Federal Standards				
	1985	1986	1987	1988	1989
Ozone (O ₃)	7	4	2	2	4
Nitrogen Dioxide ¹ (NO ₂)	0	0	0	0	0
Carbon Monoxide (CO)	0	0	0	0	0
Sulfur Dioxide (SO ₂)	0	0	0	0	0
Pm 10 ²	---	34	31	32	37

Source: SDAPCD, 1990

¹ California standard

² Date shown for PM10 is annual arithmetic mean in ug/m³. The Federal standard is 50 mg/m³. PM-10 at the Chula Vista monitoring station did not exceed the Federal standard for the period 1986-1989.

TABLE 8
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards		National Standards			
		Concentration	Method	Primary	Secondary	Method	
Ozone	1 Hour	0.09 ppm	-	0.12 ppm (235 µg/m ³)	Same as Primary Std.	Ethylene Chemiluminescence	
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m ³)	Non-dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m ³)	Same as Primary Standards	Non-dispersive Infrared Spectroscopy (NDIR)	
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)			
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemilumi- nescence	100 µg/m ³ (0.05 ppm)	Same as Primary Std.	Gas Phase Chemiluminescence	
	1 Hour	0.25 ppm (470 µg/m ³)		-			
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	80 µg/m ³ (0.03 ppm)	-	Pararosaniline	
	24 Hour	0.05 ppm (131 µg/m ³)		385 µg/m ³ (0.14 ppm)			
	3 Hour	-		-			1300 µg/m ³ (0.5 ppm)
	1 Hour	0.25 ppm (655 µg/m ³)		-			-
Suspended Particulate Matter (PM 10)	Annual Mean	30 µg/m ³	Size Selective Inlet High Volume Sampler	50 µg/m ³	-	High Volume Sampling	
	24 Hour	50 µg/m ³		150 µg/m ³			
	-	-		-			
Sulfates	24 Hour	25 µg/m ³	Turbidimetric Barium Sulfate	-	-	-	
Lead	30 day Average	1.5 µg/m ³	Atomic Absorption	-	Same as Primary Std.	Atomic Absorption	
	Calendar Quarter	-		1.5 µg/m ³			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Cadmium Hydroxide Straction	-	-	-	
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 µg/m ³)	Tedlar Bag Collection, Gas Chromatography	-	-	-	
Visibility Reducing Particles	1 observation	in sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70%.		-	-	-	

NOTES:

- California standards, other than ozone, carbon monoxide, sulfur dioxide (1 hour), nitrogen dioxide and particulate matter-PM 10, are values that are not to be equaled or exceeded. The ozone, carbon monoxide, sulfur dioxide (1 hour), nitrogen dioxide and particulate matter - PM 10 standards are not to be exceeded.
- National standards, other than ozone and those based on annual averages or annual geometric means, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above standard is equal to or less than one.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parenthesis are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury. All measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of mercury (1,013.2 millibar); ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent procedure which can be shown to the satisfaction of Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health. Each state must attain the primary standards no later than three years after that state's implementation plan is approved by the Environmental Protection Agency.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standards within a "reasonable time" after the implementation plan is approved by the EPA.
- Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
- Prevailing visibility is defined as the greatest visibility which is attained or surpassed around at least half of the horizon circle, but not necessarily in continuous sector.
- The annual PM 10 state standard is based on the geometric mean of all reported values taken during the year. The annual PM 10 national standard is based on averaging the quarterly arithmetic means.

4.6.2 Potential Impacts

The proposed project represents infill development in an existing urban area and is consistent with the range of uses and densities anticipated for the site in the Chula Vista General Plan, the Central Chula Vista Area Plan and the Town Centre II Redevelopment Plan. Land uses assumed in these adopted Chula Vista plans have been incorporated into regional air quality plans and strategies. As described in Section 4.3, Traffic and Parking, at buildout, the project would generate approximately 1,500 more trips than anticipated in the General Plan travel forecast. Emissions generated by these trips would contribute an increment to the region's continued inability to meet ozone standards. Due to the relatively low number of trips, the absence of congestion, and the fact that the project represents infill development with concomitantly fewer trips than would occur if the project were developed in a more outlying area, this contribution is not regarded as significant. The proposed project consists of an expansion to an existing hospital. No waste or by-products are incinerated on-site, nor will they be with the expansion. Therefore, no air quality impacts would occur due to smoke, fumes or odor emissions.

Project implementation would result in increased traffic on area roadways, particularly H Street, G Street, Fourth Avenue and Fifth Avenue. Congestion can sometimes result in build-up of CO concentrations due to idling vehicles. According to the traffic analysis, however, all roadway segments and intersections would operate at Level of Service C (LOS C) or better with the exception of H Street/Fourth Avenue intersection which would operate at LOS D during the PM peak hour. The City of Chula Vista has adopted threshold standards which establish an LOS C standard for City streets; LOS D is acceptable at one AM and one PM peak hour. The project would comply with the city's threshold standard with respect to traffic congestion. Adverse air quality impacts due to traffic congestion are therefore not anticipated with project implementation.

The parking structure located on-site consists of 5 levels, one below grade, one at grade, and three above grade. With adequate ventilation at the exits and entrances to the underground level,

no carbon monoxide build up is expected, therefore no air quality impacts are anticipated in conjunction with the parking structure.

Construction-Phase Impacts

Short-term air quality impacts are anticipated during the grading and construction phases of the project. Construction phase impacts will be limited to the grading and construction phases and are not considered to be significant due to their temporary impact. With implementation of standard dust control measures during grading and construction phases, no significant air quality impacts are anticipated.

4.6.3 Mitigation Measures

Short-term construction phase air quality impacts would be associated with the proposed expansion of the Scripps Memorial Hospital. Implementation of standard dust control measures during grading and construction would mitigate these impacts to below a level of significance.

4.6.4 Analysis of Significance

The proposed project would be consistent with the City of Chula Vista's Threshold Standards for congestion with a LOS less than C occurring only during the PM peak hour at one intersection within the proposed project vicinity. With the proposed traffic mitigation measures, operations at this intersection would improve. With implementation of standard dust control measures during grading and construction, construction phase air quality impacts will be below a level of significance. No significant air quality impacts are anticipated.

4.7 GEOLOGY AND SOILS

A geotechnical investigation was prepared for the Scripps Memorial Hospital Expansion project in April 1991 by Robert Prater Associates. The following section is based on information contained in this report. The entire report is included as Appendix F to this document.

4.7.1 Existing Conditions

Since the proposed project is an expansion of an existing hospital site, only the western 8.9 acre portion of the site that the expansion would occur on was examined in the geotechnical analysis. The site is rectangular in shape and relatively flat with elevations ranging from a high of approximately 61-feet above mean sea level (AMSL) in the eastern portion of the site to a low of approximately 54-feet AMSL in the western portion of the site. The site is currently developed with commercial uses with a large single story main structure in the northeast portion of the site and several outlying buildings across the remainder of the property. The structures are surrounded by paved parking and driving areas with a limited amount of landscaping.

-- Subsurface Geology

The subsurface soils on the property include fill soils comprised of loose to medium dense, clayey sand. Medium dense to very dense, clayey sand (formational sandstone) occurs beneath the fill soils in the northwestern portion of the site. Formational mudstone and formational sandstone occur beneath the fill soils in the southern and eastern portion of the site.

According to Robert Prater Associates, the sandy clay formational materials (formational mudstone) have a medium potential for expansion and the clayey sand (formational sandstone) materials have a low potential for expansion.

-- Geologic Setting

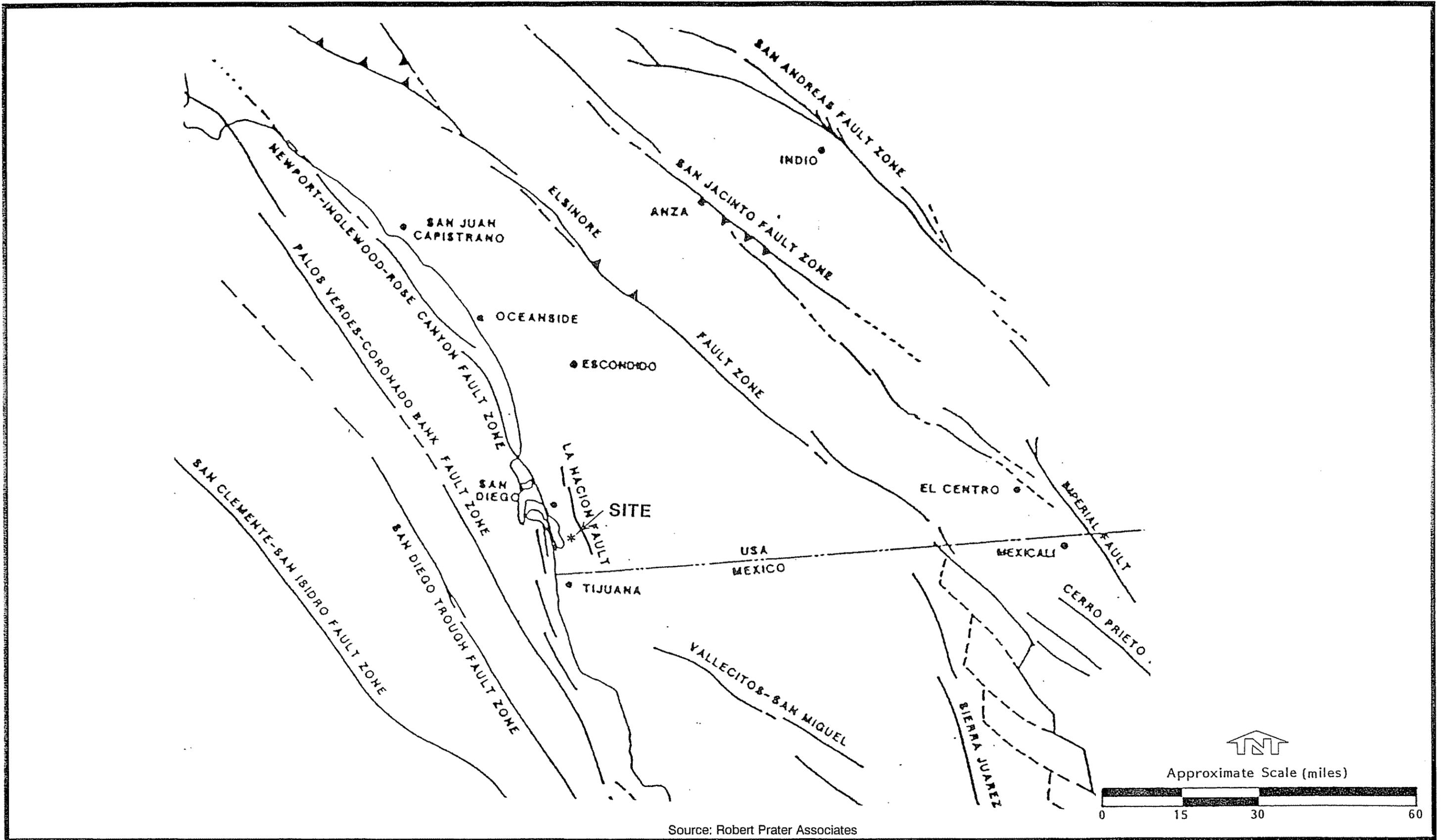
The project site is underlain by relatively shallow artificial fill soils which overlie formational mudstone and sandstone of the Bay Point Formation. The Bay Point Formation is typically comprised of marine and non-marine, medium dense, silty and clayey sandstone deposited during the late Pleistocene epoch. Occasional beds of stiff to very stiff sandy and silty clay also exists. In addition, poorly-cemented, friable sand lenses occur within this formation.

-- Ground Water

Free ground water was not encountered in any of the exploratory borings drilled at the site and no surface seeps were observed. Based on the topography and elevation of the property and the proximity to the San Diego Bay, the depth to ground water has been estimated at 50 feet.

-- Seismic Setting

No faults are known to pass through the project site. Figure 25 shows the local faulting in the area. The prominent fault zones generally considered to have the most potential for earthquake damage in the vicinity of the site are the active Elsinore and San Jacinto fault zones mapped approximately 43 and 64 miles northeast of the site and active offshore faults including the Coronado Bank fault zone approximately 14 miles southwest of the site. Local faulting of significance includes the Rose Canyon fault zone and the La Nacion fault zone. The Rose Canyon fault zone has been suggested to trend beneath the San Diego Bay area approximately 4.5 miles southwest of the property. The La Nacion fault zone is mapped approximately 1.5 miles east of the site. The Rose Canyon fault is considered active by the California Division of Mines and Geology (CDMG). The La Nacion fault is considered potentially active by CDMG (Reference - CDMG, 1977).



Scripps Memorial Hospital Expansion
Regional Fault Location Map

Figure
25

The La Nacion fault zone is 0.5-7 miles wide with vertical displacements ranging from 20-200 feet. Long recurrence intervals have been postulated for the La Nacion fault zone for a moderate earthquake and very long intervals for large earthquakes. Radiocarbon data suggests that recurrence intervals for significant earthquakes along the La Nacion fault zone may be measured in terms of thousands of years (Southern California Earthquake Preparedness Project, 1989).

In 1980, excavation for the South Bay Regional Center located near the corner of Third Avenue and H Street, identified the Chula Vista fault. The fault offsets the Quaternary age Bay Formation and is considered potentially active. That is, the fault is not clearly still active but its lack of activity in the recent geologic past (roughly the last 11,000 years) cannot be proven either. The information known on this fault is not enough to include it in a Special Studies Zone, but it is thought to be at least as active as the La Nacion fault zone to the east.

4.7.2 Potential Impacts

Based on results of the geotechnical report prepared for the site, the project site would be suitable for future construction. The primary features of concern include: 1) the presence of potentially expansive soils in a potentially seismically active area; 2) the presence of existing fill soils; and 3) possible presence of foundation remnants, underground utilities, or other subsurface complexities related to previous site usage.

-- Geologic Hazards

Geologic hazards at the site would be most critical during earthquakes and can be divided into two general categories, fault offset hazards and shaking hazards. Based on available published information, no known faults cross the site although the Chula Vista fault has been observed within one block of the site and the La Nacion fault zone has been mapped

1.5 miles to the east. Potential hazards resulting from surface rupture or fault offset is not considered to be greater than elsewhere in San Diego County.

During a major earthquake, strong ground shaking of the site would probably occur. Strong ground shaking not only can cause structures to shake, but it can also induce other phenomena that may indirectly cause substantial ground movements resulting in damage to structures. These phenomena include soil liquefaction, seismically induced waves such as tsunamis and seiches, inundation due to dam or embankment failure, landsliding, lateral spreading, differential compaction, and ground cracking. The information developed from research included in the geotechnical study prepared for the site indicates that the location of the site and the subsurface soil conditions would not be conducive to any of these phenomena.

-- Loose Natural Fills/Poorly Compacted Fills

The results of subsurface drillings indicated the presence of loose natural fills or poorly compacted fills on the project site with average depths of 2 to 4 feet. In the event that existing undocumented or poorly compacted fill soils or loose natural soils are present beneath future improvement areas, it would be necessary to remove and recompact the loose materials.

-- Expansive Soils

The results of subsurface drillings indicated the presence of formational mudstone, which has a medium potential for expansion. Where potentially expansive soils are present close to planned finish grade elevations, the placement of a layer of low-expansion potential sandy soil beneath slabs-on-grade may be required to reduce the potential for damage due to swelling and shrinkage of the clayey materials.

4.7.3 Mitigation Measures

A number of recommendations and mitigation measures have been developed by Prater & Associates. These recommendations and measures include the following:

A. Earthwork

1. Clearing and Stripping

The site should be cleared of all obstructions including the existing building, pavements, underground utilities, and any miscellaneous trash or debris that may be present at the time of construction. After clearing, the ground surface should be stripped of surface vegetation as well as associated root systems. Holes resulting from the removal of buried obstructions that extend below the proposed finished site grades should be cleared and backfilled with suitable material compacted to the requirements given under "Compaction." Prior to any filling operations, the cleared and stripped materials should be disposed of off-site.

2. Treatment of Existing Fills and Soft Topsoils

The basement excavation will partially remove the existing fill and soft topsoil within the building limits. In order to provide suitable foundation support for the building and other proposed improvements outside the limits of the basement excavation, all existing fill and soft topsoils that remain after the necessary site excavations have been made shall be removed and recompacted. The recompaction work should consist of a) removing all existing fill and soft topsoil down to firm natural ground, b) scarifying, moisture conditioning, and compacting the exposed natural subgrade soils, and c) replacing the fill material as compacted structural fill. The areal extent and depth required to remove the fills should be determined ~~by our representative~~ during the excavation work based on ~~his~~ ~~an~~ examination of the soils being exposed. Any unsuitable materials (such as oversize rubble and/or organic matter) should be selectively removed and disposed of off-site.

3. Excavation

Based on the results of the exploratory borings and our experience with similar soils, it is our opinion that the required site excavations can be accomplished utilizing ordinary heavy earthmoving equipment, however the bidding contractors should make their own independent evaluation of the excavatability of the on-site materials prior to submitting their bids.

4. Subgrade Preparation

After the site has been cleared and stripped, the exposed subgrade soil in those areas to receive fill, building improvements and/or pavements should be scarified to a depth of 8 inches, moisture conditioned, and compacted to the requirements of "Compaction." In areas where dense undisturbed formational soils are exposed at the subgrade surface, the subgrade need not be scarified and compacted.

5. Low-Expansion Potential Fill/Soil Layer

Because of the high expansion potential of the more clayey formational soils, we recommend that the basement floor slab and any adjoining exterior slabs-on-grade east of the basement shall be supported on an 18-inch minimum thickness of low-expansion potential soil. Where potentially expansive soil is exposed at or within 18 inches of the finish basement subgrade level, this will require that the soils be undercut and replaced with 18-inch thickness of compacted low-expansion potential on-site or imported sandy soil. In addition, in fill areas outside the perimeter of the basement the upper 18 inches of the finish subgrade soils should be a compacted low-expansion potential on-site or imported sandy soil. The suitability of soils for use beneath floor slabs should be determined in the field at the time of construction. The low-expansion potential soil layer should extend a minimum of 5 feet beyond the perimeter limits of any proposed adjoining exterior slabs-on-grade.

6. Materials for Fill

All on-site soils with an organic content of less than 3 percent by volume are in general suitable for reuse as fill except where low-expansion potential fill is required. Fill material should not contain rocks or lumps over 6 inches in greatest dimension and not more than 15 percent larger than 2-1/2 inches. Any required imported fill material should be a low-expansion potential (U.B.C. expansion index of 30 or less), granular soil with a plasticity index of 12 or less. No more than 25 percent of the fill should be larger than 1/4-inch. All materials for use as fill should be approved prior to filling.

7. Compaction

All structural fill should be compacted to a minimum degree of compaction of 90 percent based upon ASTM Test Designation D 1557-78. The upper 6 inches of subgrade soil beneath pavements should be compacted to a minimum degree of compaction of 95 percent just prior to placement of the aggregate base layer. Fill material should be spread and compacted in uniform horizontal lifts not exceeding 8 inches in uncompacted thickness. Before compaction begins, the fill should be brought to a water content that will permit proper compaction by either: 1) aerating the fill if it is too wet, or 2) moistening the fill with water if it is too dry. Each lift should be thoroughly mixed before compaction to ensure a uniform distribution of moisture.

8. Temporary Construction Slopes

Based on our subsurface investigation work, laboratory test results, and engineering analysis, temporary cut-slopes for construction of the proposed retaining walls should be safe against mass instability at an inclination of 1 (horizontal) to 1 (vertical). In the event clean sandy soils with low cohesion are exposed in temporary cuts (such as encountered in Boring 5 from 4 to 11 feet) flatter inclinations may be necessary. Some localized sloughing or ravelling of the soils exposed on the slopes, however, may occur. Since the stability of temporary construction slopes will depend largely on the contractor's activities and safety precautions (storage and equipment

loadings near the tops of cut-slopes, surface drainage provisions, etc.) it should be the contractor's responsibility to establish and maintain all temporary construction slopes at a safe inclination appropriate to his methods of operation.

9. Permanent Slopes

Any required cut and fill slopes must be constructed to an inclination no steeper than 2 (horizontal) to 1 (vertical). The project plans and specifications should contain all necessary design features and construction requirements to prevent erosion of the on-site soils both during and after construction. Slopes and other exposed ground surfaces should be appropriately planted with a protective groundcover.

Fill slopes should be constructed so as to assure that the recommended minimum degree of compaction is attained out to the finished slope face. This may be accomplished by "backrolling" with a sheepsfoot roller or other suitable equipment as the fill is raised. Placement of fill near the tops of slopes should be carried out in such a manner as to assure that loose, uncompacted soils are not sloughed over the tops and allowed to accumulate on the slope face.

10. Trench Backfill

Pipeline trenches should be backfilled with compacted fill. Backfill material should be placed in lift thicknesses appropriate to the type of compaction equipment utilized and compacted to a minimum degree of compaction of 90 percent by mechanical means. In pavement areas, that portion of the trench backfill material within the pavement section should conform to the material and compaction requirements of the adjacent pavement section.

11. Drainage

Positive surface gradients should be provided adjacent to the building, and roof gutters and downspouts should be installed so as to direct water away from foundations and slabs toward

suitable discharge facilities. Ponding of surface water should not be allowed, especially adjacent to the building or on pavements.

B. Foundations

1. Footings

The proposed building must be supported on conventional, individual-spread and/or continuous footing foundations bearing on undisturbed natural soil and/or well-compacted fill material. All footings should be founded at least 24 inches below the lowest adjacent finished grade. Footings located adjacent to the tops of slopes should be extended sufficiently deep so as to provide at least 8 feet of horizontal cover or 1-1/2 times the width of the footing, whichever is greater, between the slope face and outside edge of the footing at the footing bearing level. Footings located adjacent to utility trenches should have their bearing surfaces situated below an imaginary 1-1/2 to 1 plane projected upward from the bottom edge of the adjacent utility trench.

At the recommended depths, footings may be designed for allowable bearing pressures of 4,000 pounds per square foot (psf) for combined dead and live loads and 5,300 psf for all loads, including wind or seismic. The footings should, however, have a minimum width of 12 inches. All continuous footings should contain top and bottom reinforcement to provide structural continuity and to permit spanning of local irregularities. A minimum of two No. 4 top and two No. 4 bottom reinforcing bars must be provided in the footing.

Settlements under building loads are expected to be within tolerable limits for the proposed structure. For footings designed in accordance with the recommendations presented in the preceding paragraphs, it is estimated that post-construction differential settlements between adjacent columns and/or walls should not exceed 1/4-inch in 25 feet.

2. Slabs-On-Grade

Concrete slabs-on-grade may be supported directly on low-expansion potential compacted fill soil and/or firm undisturbed low-expansion potential natural soil. Slab reinforcing as well as slab thicknesses should be designed in accordance with the anticipated use of and loading on the slab. As a minimum, however, the slabs should have a minimum thickness of 4 inches and be reinforced with 6 x 6 - W1.4xW1.4 welded wire fabric to minimize hairline cracking of the slabs due to concrete shrinkage. The wire fabric should be supported on small concrete block chairs or equivalent prior to placement of concrete and not hooked into place in the slab. In some cases, hooking the wire fabric to lift it into position during placement of the concrete is not always effective and often results in the wire fabric being positioned at the bottom of the slab.

In areas where moisture-sensitive floor coverings are to be utilized and in other areas where floor dampness would be undesirable, consideration shall be given to providing an impermeable membrane beneath the slabs. The membrane should be covered with 2 inches of sand (minimum sand equivalent of 30) to protect it during construction. The sand should be lightly moistened just prior to placing the concrete.

3. Basement Walls

Basement walls must be designed to resist lateral earth pressures and any additional lateral pressures caused by surcharge loads on the adjoining retained surface. Basement walls must be designed for an equivalent fluid pressure of 40 pcf plus an additional uniform lateral pressure of $12H$ pounds per square foot where H = the height of backfill above the top of the wall footing in feet. Wherever walls will be subjected to surcharge loads, they should also be designed for an additional uniform lateral pressure equal to one-half the anticipated surcharge pressure.

The preceding design pressures assume that there is sufficient drainage behind the walls to prevent the build-up of hydrostatic pressures from surface water infiltration. Adequate drainage may be provided by means of weepholes with permeable filter material installed behind the walls or by means of a system of subdrains.

Backfill placed behind the walls should be compacted to a minimum degree of compaction of 90 percent using light compaction equipment. If heavy equipment is used, the walls should be appropriately temporarily braced.

Basement walls should be supported on footing foundations designed in accordance with the recommendations presented previously under "Footings." Lateral load resistance for the walls can be developed in accordance with the recommendations presented under "Lateral Loads."

4. Lateral Loads

Lateral load resistance for the building supported on footing foundations may be developed in friction between the foundation bottoms and the supporting subgrade. An allowable friction coefficient of 0.25 is considered applicable. An additional allowable passive resistance equal to an equivalent fluid weight of 350 pounds per cubic foot acting against the foundations may be used in design provided the footings are poured neat against the adjacent undisturbed native soils and/or compacted fill materials. These lateral resistance values assume a level surface in front of the footing for a minimum distance of 3 times the embedment depth of the footing and any shear keys and are based on a factor of safety of 1.5.

4.7.4 Analysis of Significance

No geologic or soil conditions were indicated that would pose a significant constraint to development of medical facilities on-site. Conformance with the Uniform Building Code, approval by OSA of geologic and geotechnical studies and structural design of the hospital facility, and recommendations made in the geotechnical study, as described above, would be

necessary to mitigate potential impacts due to potentially expansive soils, or seismic activity. Therefore, geology and soils impacts will be mitigated to a level below significance.

4.8 WATER CONSERVATION

4.8.1 Existing Conditions

The moderating effects of San Diego's maritime climate contribute to the warm summers, mild winters and infrequent rainfall that characterize the semi-arid San Diego climate. Due to the semi-arid conditions in San Diego County, a majority of the water supplied to residents and businesses by the Metropolitan Water District (MWD) and the San Diego County Water Authority (CWA), is imported from sources in northern California and from the Colorado River.

The project site is currently developed with approximately 8.9 acres of commercial uses and 4.7 acres of existing hospital uses, and therefore a water demand currently exists for the site. According to Water/Sewer Planning and Design Guidelines developed by the City of San Diego, commercial use water demands are approximately 5,000 gallons/day/net acre for commercial uses (where a net acre is 0.8 x the gross acreage). Using this rate, existing water demand on the project site is estimated to be 36,000 gallons per day (gpd). This estimate may be somewhat higher than the actual use on the commercial site as the site is considered to be underutilized at this time. Currently on the commercial site there are three casual dining facilities, a cinema, a medical facility, a bank, a gas station, furniture store, a roller rink and an indoor swap meet building which is used by Scripps Hospital for administrative uses. The site is also landscaped with street trees and shrubs. The existing hospital on-site uses approximately 24,500 gpd (approximately 6,500 gpd/net acre). This estimate is based on meter readings for April 8 - June 3 for Scripps Hospital.

4.8.2 Potential Impacts

Utilizing the information above regarding the water demand of the existing hospital (6,500 gpd/net acre), it is assumed that the 8.9-acre expansion would require an approximate 46,280 gpd increase in water demand. However, the water demand from the commercial site (approximately 36,000 gpd) would no longer exist as the hospital expansion would take its place.

Therefore, it is anticipated that a 10,280 gpd water demand increase would occur with the hospital expansion. Due to the region's dependence upon imported water and the current drought the County of San Diego is currently experiencing, implementation of the project would contribute to a cumulatively significant regional need to conserve water.

Landscape plans have been developed for the hospital expansion, for both Phase 1 and Phase Ultimate, as shown on Figures 12 and 13. A majority of the species proposed to landscape the parking areas, courtyards and adjacent sidewalks are accepted as low water use species. All of the planting areas would receive uniform water coverage by means of an automatically controlled, underground pipe sprinkler system. Trees on site would receive individual irrigation valving. For further water conservation and to minimize erosion, automatic moisture sensing controller, pressure compensating drip and low precipitation rate sprinkler equipment would be used in all landscaped areas.

The hospital and medical office building proposes water features along the exterior portions of the building. The water used in these features would be recirculated for repeated use. In addition to using low water usage landscaping, the applicant would comply with all water conservation measures required by State law. These measures are included as Appendix F H to this report.

Water consumption would be required during mass grading on the site. The applicant would work with the City of Chula Vista and the Sweetwater Authority to obtain a permit to set up a temporary meter on-site for potable water consumption for dust control measures and grading activity.

4.8.3 Mitigation Measures

Measures have been incorporated into the project design to reduce water consumption. These measures include landscaping with low water usage plant species, low water irrigation systems and compliance with State standards for water conservation. Final landscape plans demonstrating incorporation of water conservation measures will be subject to review and

approval by the Landscape Architect of the City of Chula Vista staff prior to issuance of building permits for the proposed project.

4.8.4 Analysis of Significance

Implementation of the proposed project would contribute to a significant cumulative need to conserve water on a region-wide basis. Use of low water usage species in the landscape plans, moisture sensing and low precipitation rate sprinkler systems and compliance with the State laws described above would help minimize water consumption on-site. However, due to the current drought conditions that San Diego County is currently experiencing, the project would have cumulative unmitigated impacts associated with water use.

4.9. PUBLIC FACILITIES/SERVICES

This section discusses the potential impacts of the proposed project on existing services and public facilities. Public facilities and services addressed in this section include storm drains, fire protection, sewer service and schools.

4.9.1 Existing Conditions

Storm Drain

The existing storm drain easement is located along the northern border of the site in the area proposed to be dedicated to the Sweetwater School District for construction of a new classroom and connects to the existing system located in Fifth Avenue.

Fire Protection

Fire protection to the area is currently provided by the Chula Vista Fire Department. Fire flow requirements are based on type of construction and square footage of the building. The minimum fire flow requirement for institutional uses within the City of Chula Vista is 3,000 gallons per minutes.

Sewer Improvements

Sewer lines serving the proposed project are located in H Street and G Street. Portions of the sewer lines in H Street and G Street are currently flowing near or over capacity at times of peak flow.

School Service

The proposed Scripps Hospital Expansion is located within the Chula Vista Elementary School District and the Sweetwater Union High School District areas in the City of Chula Vista. Although no direct student generation would occur with implementation of the proposed non-residential project, students may be indirectly generated as more employees are hired with expansion of the hospital facility and move into the area to live and work.

The State Legislature, through the enactment of Government Code Sections 53080, 65995 and 65996, has determined the fair share burden of school facilities mitigation costs that may be placed on any commercial development project. Under Code Section 65995(b), the maximum development fee is \$0.25 per square foot of commercial development. This maximum fee is established for quasi-adjudicatory actions such as a conditional use permit (CUP). The maximum fee may not apply to quasi-legislative actions such as a plan amendment.

4.9.2 Potential Impacts

Storm Drain

The proposed project would correct existing storm drain flooding problems affecting the adjacent junior high school by ducting the storm drain into the hospital's proposed storm drain system. The existing drainage easement located in the area proposed to be dedicated to the Sweetwater School District for construction of a new classroom would be abandoned. The proposed storm drain system would be located adjacent to an area immediately south of the existing easement within the employee and emergency entrance along the northern boundary of the site, and would connect to the existing system installed in Fifth Avenue. The applicant proposes to work closely with the City of Chula Vista Engineering Department in designing the proposed storm drain system.

Development of the subject site must comply with all applicable regulations established by the Environmental Protection Agency (EPA) as set forth in the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharge. If required, a NPDES permit would be obtained for any stormwater discharge, discharge of wells or temporary groundwater dewatering associated with excavation for the parking garage and any below ground structural improvements.

Fire Protection

The proposed project would be constructed in compliance with Chula Vista Fire Department standards, including:

- All buildings including the parking structure will contain an approved standpipe and fire sprinkler system and a fire alarm system.
- Additional fire hydrants will be installed as required by the Chula Vista Fire Department.
- All State Fire Marshall CAC - Title 19 regulations shall be met.
- Provision of a 26-foot wide access road into Chula Vista Junior High School from the north interior road off of Fifth Avenue.

Furthermore, the City of Chula Vista Fire Department will work directly with the Sweetwater Authority to ensure adequate water pressure for emergency fire flows. The required fire flow for a fire sprinkler system shall be 3,000 gallons per minute.

Sewer Improvements

The sewer line in H Street is nearing capacity, therefore the applicant proposes to install a gravity sewer line and direct all sewage to G Street so as not to further impact the H Street line. Portions of the sewer lines in H Street and G Street are flowing near or over capacity at times of peak flow. Prior to issuance of any type of permit for project implementation, preparation

of a technical report will be completed to the satisfaction of the City Engineer and incorporated as conditions of project approval addressing the following items in both the H Street and G Street sewer systems:

- a) Average daily wastewater flow from the project.
- b) Peak wastewater flow from the project and the time and day of week when peak flow is expected to occur.
- c) Hydraulic analysis of the impact that peak flow will have on existing sewer lines from point of connection to the wastewater flow metering station. Existing flows shall be included.
- d) Recommendations for any improvements necessary to maintain flow in the sewers in accordance with City of Chula Vista design standards.

Schools

As stated under Existing Conditions, State Government Code Sections 53080, 65995 and 65996 determine the fair share burden of school facilities mitigation costs that may be placed on any commercial development project. Under Government Code Section 65995(b), the maximum development fee is \$0.25 per square foot of development. With implementation of Phase I of the Scripps Hospital Expansion, approximately \$45,000 in school fees would be collected.

The above State Government Code Sections applies to the Scripps Hospital Expansion development due to the fact that the project is considered a "development project" such as a CUP, as defined by the discretionary actions required for approval (Section 2.0 Project Description). A "development project" is defined as "any project undertaken for the purpose of development, and includes the issuance of a permit for construction or reconstruction, but not a permit to operate." (Government Code Section 53080(2)).

The project does not require any quasi-legislative action such as a rezone or redevelopment plan amendment. The City of Chula Vista has determined that the proposed project is in

conformance with the Town Centre II Redevelopment Plan, therefore a plan amendment would not be required. Furthermore, zoning for the proposed expansion site is C-C-D (Central Commercial). A hospital facility is allowed within this zone with approval of a CUP.

Since the project does not require a rezone or plan amendment, the project would not be considered a legislative action. Because the project is not legislative in nature, but is considered a development project, Government Code Sections 53080, 65995 and 65996 would be applicable for contribution to school facilities with project implementation. As described above, the maximum fee established by these codes is \$0.25/square foot.

4.9.3 Mitigation Measures

Storm Drain

Development of the site must comply with all applicable regulations established by the EPA as set forth in the National Pollutant Discharge Elimination System (NPDES) permit requirements for storm water discharge. If required, a NPDES permit would be obtained for any storm water discharge, discharge of wells or temporary groundwater dewatering associated with excavation for the parking garage and any below ground structural improvements.

Fire Protection

With construction of the proposed project in compliance with the Chula Vista Fire Department standards, no mitigation measures would be required.

Sewer Services

Preparation of a technical report shall be completed to the satisfaction of the City Engineer and incorporated as conditions of project approval addressing the items listed under Section 4.9.2 Potential Impacts for sewer services for both the H Street and G Street sewer systems.

Schools

As directed by Government Code Sections 53080, 65995 and 65996, the Scripps Hospital Expansion project would provide a fair share contribution of \$0.25 per square foot of development to mitigate impacts to the Chula Vista Elementary School District and Sweetwater Union High School District with project implementation.

4.9.4 Analysis of Significance

With implementation of the above measures, impacts to storm drains, fire protection and sewer services associated with the proposed project would be mitigated to below a level of significance.

As employees move into the area to work at the expanded Scripps Hospital, the proposed project may indirectly generate additional students attending the Chula Vista Elementary School District and Sweetwater Union High School District classrooms. With implementation of the mitigation measure described above, impacts to the school district would be mitigated to below a level of significance.

5.0 REQUIRED CEQA SECTIONS

5.1 CUMULATIVE EFFECTS

This section provides a summary of potential cumulative impacts. Cumulative impacts "shall be discussed when they are significant" (CEQA Guidelines, Section 15130(a)). Cumulative impacts may be defined as environmental changes resulting from a single project (Scripps) or a number of separate projects. As defined in CEQA Guidelines, Section 15355(b):

The cumulative impact from several projects is the change in the environment which results from the incremental impacts of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Thus, the following cumulative impact discussion addresses: (1) cumulative environmental effects of the Scripps Project alone (i.e., environmental consequences when all documented project impacts are considered collectively); and (2) environmental effects on a broader scale, considering other projects in the project vicinity that may incrementally impact one or more environmental resources. For purposes of this analysis, a regional overview is discussed first, followed by a description of the Scripps cumulative effects.

-- Regional Cumulative Effects

The proposed Scripps Hospital Expansion project is only one of several development projects being proposed in the vicinity of the Scripps project. In order to address cumulative environmental impacts from similar type projects, all development projects within reasonable distance from the proposed project known to date were identified. The study area for cumulative projects includes development projects within a one-mile radius. These projects are listed on

Table 9 along with the proposed project, and are considered collectively to determine potential cumulative environmental effects.

In general, development of the proposed and approved projects would most likely cumulatively effect air quality, traffic operations and visual quality in the area. Mitigation measures developed for each individual project may help reduce these cumulative effects. An EIR is currently being processed for the Chula Vista Mall Expansion project. That EIR will analyze potential direct and cumulative effects of the mall expansion on the surrounding area.

The traffic study prepared for the proposed project looked at traffic generation from both the Chula Vista Mall Expansion project and the approved Rohr Industries project for buildout traffic purposes. Cumulative traffic impacts were not considered significant since the City of Chula Vista's Threshold Standards were not exceeded.

Chula Vista Mall Expansion	Proposed/ Not approved	Sec. F & 4th Avenue	Expansion of existing mall to add Mervyn's Dept. Store & theater complex
Rohr Office Expansion	Approved/Under construction	South of F Street (Lagoon Drive)	Construction of 245,000 sq.ft. office complex
Salvation Army Housing Project	Approved	628-638 3rd Avenue	75 Senior Low-income residential multi-family units
Pieri Project	Proposed/Not Approved	435 3rd Avenue	5-story mixed-use 119,000 sq.ft. commercial/office proposal
Mercy Medical Office Building	Proposed/Not Approved	North side of F East side of Landis	Proposed 28,125 sq.ft. medical office building
H & Glover Medical Building	Approved	374 H Street	2-story, 3,589 sq.ft. medical office bldg.

-- Scripps Hospital Expansion Cumulative Effects

Traffic & Parking

The effects of project traffic in combination with existing development of the surrounding vicinity, as discussed in Section 4.3, were evaluated in the traffic analysis completed for this project. Mitigation measures are offered to mitigate both short-term and long-term impacts associated with project implementation as indicated in Section 4.3.

At build-out, the project would generate approximately 1,500 more trips than anticipated in the General Plan travel forecast and would contribute to the overall increase of traffic volumes in the City of Chula Vista from surrounding development projects such as Rohr Expansion and Chula Vista Mall Expansion projects. Some areas of the City's circulation system are projected to operate below acceptable levels in the future, due to cumulative traffic generated by development throughout the City. Due to the fact that the project would not cause any road segments or intersections to drop below Chula Vista Threshold Standards, the incremental contribution of the project to cumulative traffic impacts is not regarded as significant.

Air Quality & Noise

The project would generate traffic and associated additional air pollutants in the San Diego area. Traffic-generated noise would be created by the project, contributing to the cumulative increase in the noise levels in the area. Location of the project in an existing developed urban area and minimization of congestion through implementation of traffic mitigation measures, would, however, reduce the incremental contribution of the project to cumulative air quality and noise effects.

Visual Quality

The project would introduce more massive building elements into the Town Centre II Redevelopment Area than currently exist, including a 6-story medical office wing, a 4-story medical office wing, a 3-story, plus basement hospital addition and a 5-level parking garage (1 level would be underground). Introduction of such larger building elements could encourage intensification of land uses on adjacent parcels resulting in a more dense urban area along H Street and Fifth Avenue. Such a change would be particularly apparent along Fifth Avenue which is currently developed with less intense urban uses. Such intensification of development is, however, anticipated in the Central Chula Vista Area Plan which designates the project area as part of the City's urban core.

Schools

Indirect student generation associated with new employees of the expanded hospital may tax the Chula Vista Elementary School District whose schools west of I-805 are already operating above capacity. Although the residences of new employees of the expanded hospital cannot be determined, the District estimates that 80 new elementary school children could be generated by future employees, based on an assumption that the project would generate 480 employees (Correspondence, Kate Shurson, Chula Vista Elementary School District, July 28, 1991). According to the District, this represents a cumulative impact associated with the proposed project.

Water Conservation

Expanded development on the site would contribute to an overall regional demand for imported water and would place an incremental burden on scarce potable water supplies. The net increase in water use associated with displacement of existing uses on the site and replacement with expanded hospital uses is considered a significant cumulative

impact. Water conservation measures in excess of State requirements have been incorporated into the project's architectural and landscape design.

5.2 GROWTH INDUCEMENT

The proposed project would be located in an existing developed area within the City of Chula Vista and would be an expansion of an existing use. The extent to which the project could induce growth in surrounding areas is limited since virtually no undeveloped land currently exists in the vicinity of the proposed project. The project would be served by existing facilities and services. No facility or service extensions, which could induce growth, would be required to implement the project. Expansion of the hospital on-site may attract other medical office business to the area. In general, these uses would be accommodated on-site in the proposed medical office building.

5.3 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE OF THE ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The project site is located within an urbanized area of the City of Chula Vista. The site is currently improved and contains the existing hospital, a variety of commercial uses, and associated paved parking areas. No physical resources such as archaeological sites or biologically sensitive habitats are present on the site. Implementation of the hospital expansion and associated medical office buildings may have certain cumulative and long term effects on the environment, however, not at the expense of losing any significant physical resources.

Under the proposed project, a number of commercial uses would be displaced. With the Chula Vista Shopping Center and the Third Avenue Redevelopment area in close proximity, no long term impacts associated with displacement of the existing commercial facilities are anticipated with respect to community character.

6.0 ALTERNATIVES

As described in Section 2.0, Project Description, a variety of alternatives were considered by the City of Chula Vista and the Redevelopment Agency prior to selecting the Scripps Hospital expansion as the appropriate redevelopment project for the project site. These alternatives are summarized in Section 2.0 and described in detail in the Redevelopment Agency Agenda Statement which has been incorporated by reference into this document. After the Redevelopment Agency selected Scripps Hospital as the preferred redevelopment option for the Town Centre II Redevelopment Area, two additional alternative development scenarios have been suggested by some of the existing tenants. These alternatives include a phasing option presented by the H Street Business Coalition and a Retail and Entertainment Alternative proposed by Circinus Corporation. Both of these alternatives are described in this section along with alternatives representing possible modifications to the proposed hospital expansion project.

6.1 NO PROJECT ALTERNATIVE

Under this alternative there would be no change from existing conditions. The hospital would not be expanded and the commercial uses located on the expansion portion of the site would remain. Scripps Memorial Hospital would remain its current size and continue to operate at over 100% capacity. Improved medical services anticipated under the expansion would not be provided at the project site location. This alternative would not preclude redevelopment of the western 8.9 acre portion of the site with expanded commercial uses. Significant unmitigated environmental impacts such as visual quality and cumulative water conservation impacts have been identified in conjunction with the proposed project which would be avoided under this alternative.

6.2 NO G STREET ACCESS

Under this alternative, access to the proposed hospital expansion project would be limited to Fifth Avenue and H Street. Emergency and employee access would not be provided from G

Street. The hospital expansion design would be the same as that which would occur under the proposed project. Potential impacts to visual quality, air quality, health, geology/soils, schools and water conservation would be the same as those associated with the proposed project since the project design would be the same under both alternatives. ~~Fiscal effects would also be the same as those for the proposed project under this alternative.~~

-- Land Use

With no access to the project site from G Street, the land trade with the junior high school would not be necessary and land would not be projected for future construction of classrooms for the junior high school. Storm drain issues associated with flooding on the junior high school property would still be addressed with this alternative.

As noted in Section 4.1, Land Use/Community Character, the existing character of G Street is largely residential with some institutional and commercial uses, in contrast to the highly commercial H Street. Under this alternative, emergency and employee vehicles would not use G Street, avoiding any changes to the existing character along G Street. However, given the multiple access points provided by the project and the limited number of employee and emergency vehicles, no significant impacts have been identified to the existing character along G Street with implementation of the project as currently proposed. No significant land use effects would therefore be associated with the proposed project which would be avoided under this alternative.

-- Traffic

Under this alternative, additional traffic generated from employees and emergency vehicles would not access the site via G Street and would not impact the residents living on G Street. However, according to the traffic study, G Street is expected to operate at LOS C or better under the proposed project and no significant traffic effects on G Street are anticipated under the proposed project. There are no significant traffic effects associated with the project which would be avoided under this alternative.

-- Noise

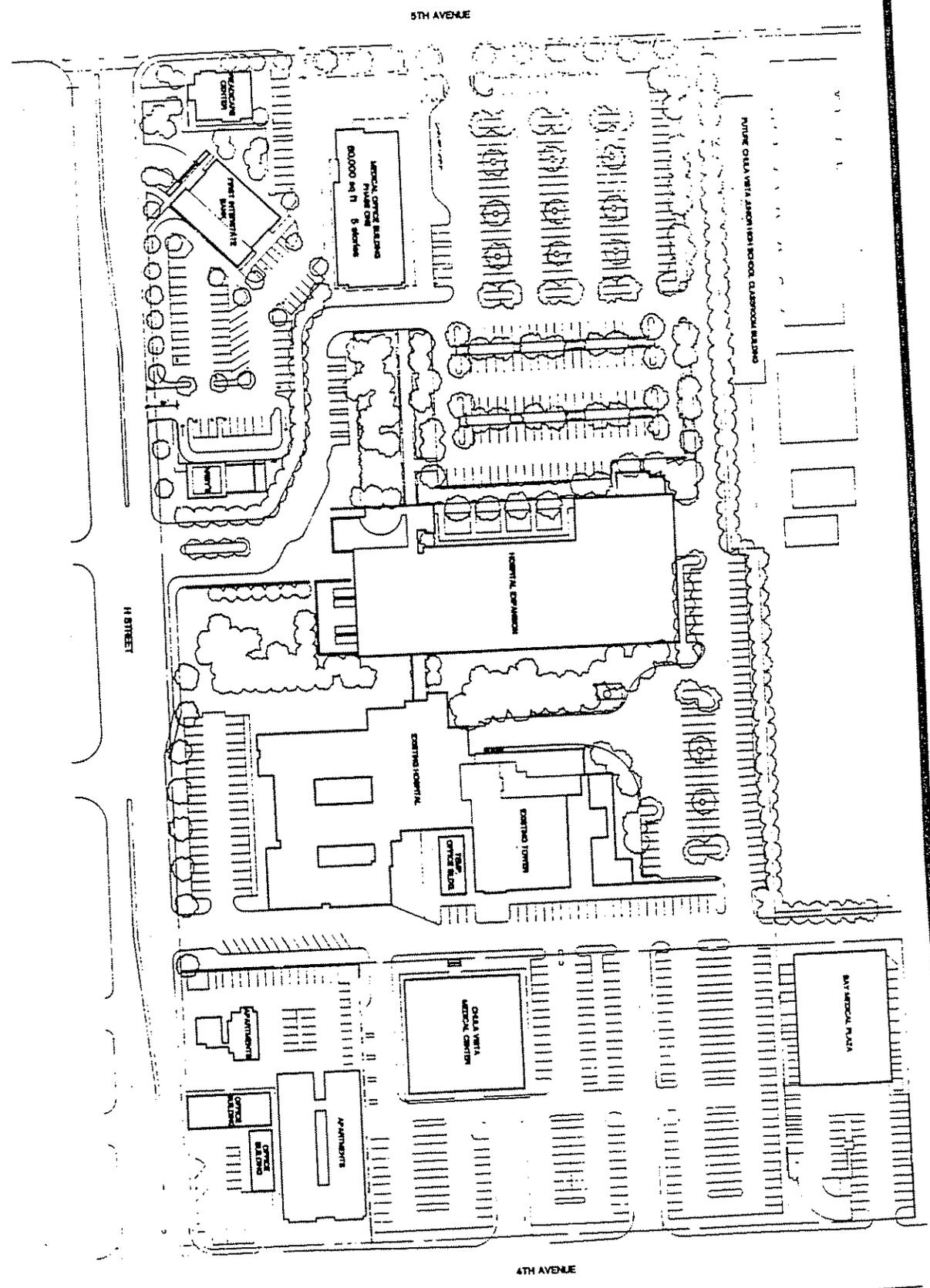
Potential noise impacts associated with the proposed project would be the same under this alternative as under the proposed project with the exception that noise generated by emergency vehicles along G Street would be avoided under this alternative. Due to the intermittent nature of emergency vehicle traffic on G Street, significant noise impacts were not identified for the project's proposal to provide emergency access from G Street.

6.3 H STREET BUSINESS COALITION ALTERNATIVE

This alternative is regarded as a phasing option. Under this alternative, the Arby's Restaurant, First Interstate Bank and the Readicare Center that are currently located on-site would remain with the first phase of the hospital expansion (see Figure 26). The hospital expansion plans would be identical to the proposed project in terms of the additional square footage and facilities to be provided. The configuration of the facilities, particularly the proposed medical office building, would, however, differ from the proposed design. In addition, the entry along H Street would need to be redesigned under this alternative to accommodate retention of Arby's. ~~According to the applicant, the overall design under this alternative would not be as efficient as under the proposed project.~~ This proposal is consistent with the General Plan by retaining commercial uses on-site.

If the H Street Business Coalition site plan (Figure 26) is compared to the Phase I site plan for the proposed project (Figure 3), a number of differences are apparent in the layout of the 8.9-acre expansion area. As shown in Figure 26, the H Street Business Coalition Alternative, a 5-story medical office building is proposed paralleling H Street just north of the Readicare Center and the First Interstate Bank. Phase I of the proposed project (Figure 3) shows a 4-story medical office building located adjacent to 5th Avenue. The location of this 4-story medical office building is important in reducing visual impacts of the project, and arose from prior design review concerns associated with building mass impacts on the existing street scene. At one time, the project proposed a 5-story medical office building with Phase I construction with

**Scripps Memorial Hospital Expansion
H Street Business Coalition Alternative**



No Scale

**Figure
26**

a 5-story wing addition in Phase Ultimate. The project was subsequently redesigned to construct a 4-story medical office building with Phase Ultimate. To further minimize the apparent bulk and scale of the structure as viewed from the street, the 6-story medical office building wing would be set back a minimum of 100-feet from H Street and Fifth Avenue.

Under this alternative, either a 5-story medical office building would be constructed in Phase I of the project with a 5-story wing expansion in Phase Ultimate, or a 4-story medical office building could be constructed with Phase I implementation paralleling H Street and a 6-story wing expansion constructed in Phase Ultimate adjacent to 5th Avenue. Health impacts would remain the same as for the proposed project since the hospital expansion would still occur under this alternative.

Impacts with respect to geology, water conservation and schools would be the same as for the proposed project.

-- Land Use/Visual Quality

Retaining the commercial uses on-site would eliminate some parking, landscaping and courtyard areas in the southwest corner of the project site during the Phase 1 development as proposed in the current project. Retention of the commercial uses on-site would offer a higher commercial utilization of the project site prior to Phase Ultimate construction and would be consistent with applicable land uses. Retention of the three on-site uses would also ensure that these services would continue to be provided in the project area. Long-term phase out of the commercial uses would provide a lengthy period to identify appropriate relocation sites for the affected businesses.

As discussed earlier, if the H Street Business Coalition site plan (Figure 26) is compared to the Phase I site plan for the proposed project (Figure 3), a number of differences are apparent in the layout of the 8.9- acre expansion area. As shown in Figure 26, the H Street Business Coalition Alternative, a 5-story medical office building is proposed

paralleling H Street just north of the Readicare Center and the First Interstate Bank. Phase I of the proposed project (Figure 3) shows a 4-story medical office building located adjacent to 5th Avenue. The location of this 4-story medical office building is important in reducing visual impacts of the project, and arose from prior design review concerns associated with building mass impacts on the existing street scene. At one time, the project proposed a 5-story medical office building with Phase I construction with a 5-story wing addition in Phase Ultimate. The project was subsequently redesigned to construct a 4-story medical office building with Phase Ultimate. To further minimize the apparent bulk and scale of the structure as viewed from the street, the 6-story medical office building wing would be set back a minimum of 100-feet from H Street and Fifth Avenue.

Under this alternative, either a 5-story medical office building would be constructed in Phase I of the project with a 5-story wing expansion in Phase Ultimate, or a 4-story medical office building could be constructed with Phase I implementation paralleling H Street and a 6-story wing expansion constructed in Phase Ultimate adjacent to 5th Avenue. In either case, selection of this alternative could result in potential visual impacts not anticipated in the proposed project and further environmental and design review would be required. Health impacts would remain the same as for the proposed project since the hospital expansion would still occur under this alternative.

Additional visual impacts may occur with the dissimilar architecture that would remain on-site during Phase 1 of the project with retention of the commercial buildings. Coordination with Chula Vista Design Review Committee and the Redevelopment Agency could reduce these visual impacts. If this alternative is selected, subsequent visual effects would be addressed at that time.

-- Traffic

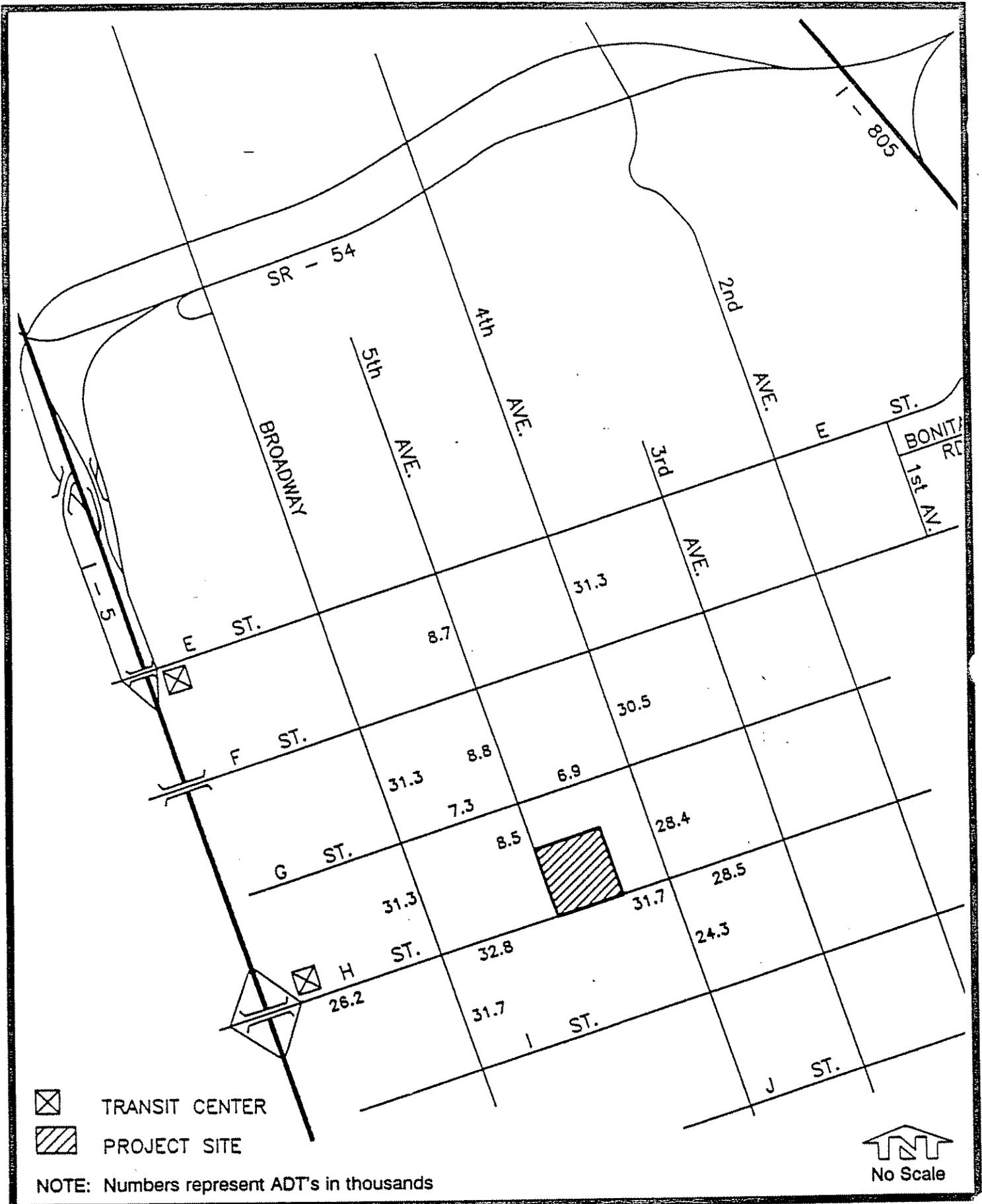
A traffic study addendum was completed by Willdan Associates in July 1991 to analyze traffic impacts associated with the H Street Business Coalition Alternative. The traffic study is included in Appendix B to this document and summarized below.

As shown on Table 10 under this alternative, approximately 3,228 additional ADT would be generated from the project site with 146 trips (splitting 90 unbound and 56 unbound) during the AM peak hour and 290 trips (splitting 142 inbound and 148 outbound) during the PM peak hour. Figure 27 illustrates the short term year 1995 H Street Coalition ADTs in the project vicinity.

Land Use	Intensity	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Arby's	2,450 sq.ft	700/1,000	1,715	4	41	27	8	69	69
First Interstate	6,750 sq.ft	200/1,000	1,350	5	41	27	10	68	68
Readi Care	3,250 sq.ft	50/1,000	163	6	8	2	10	5	11
			3,228		90	56		142	148

Table 11 shows a comparison of intersection operations between the proposed project and the H Street Business Coalition. As shown on Table 11, both the proposed project and the H Street Business Coalition would lower the LOS levels at H Street/4th Avenue and G Street/4th Avenue from C to D. The only change in peak hour LOS levels between the project and this alternative would occur during the PM peak hour at the intersection of H Street and Fifth Avenue where the LOS level is C under this alternative and B under the proposed project.

In order to evaluate the proposed access from the H Street Business Coalition alternative, it was necessary to assign the AM and PM peak hour period trips to and from the respective



**Scripps Memorial Hospital Expansion
Year 1995 & H St. Business Coalition Alt. ADT's**

**Figure
27**

driveways. Figure 28 depicts the year 1995 AM and PM peak hour turning movements at the respective driveway locations for the project. Table 12 summarizes the level of service for project access locations for the H Street Business Coalition Alternative. As shown on Table 12, it may be concluded that the access driveways proposed by this alternative would function in an efficient manner with the exception of the Readicare driveway to Fifth Avenue operating at Level of Service E during PM peak hour for left turns from the minor approach. It should be noted that southbound left turning vehicles from Fifth Avenue would not have a left turn pocket due to transitioning of the southbound Fifth Avenue left turn pocket at the H Street/Fifth Avenue signalized intersection.

The site plan indicates that the main driveway into the complex from H Street is proposed to contain left turns in and right turns in and out only. The proposed Arby's driveway would be restricted to right turns in and out only due to construction of a median along H Street. All driveways proposed to and from Fifth Avenue are proposed as full access driveways allowing left turns in and out as well as right turns in and out.

It should be noted that potential conflicts may occur at the right turn in and out driveway serving the Arby's restaurant due to close proximity to the Scripps Memorial Hospital Phase 1 expansion driveway. This could occur when vehicles making right turns out of the hospital driveway and attempt to cross the path of vehicles turning into the Arby's driveway. The problem would not occur if the hospital main driveway on H Street was an entrance driveway only.

~~Mitigation measures required for this alternative would include widening the north side of H Street by two to four feet to accommodate a raised median along H Street. It should be noted that the retention of the H Street Business Coalition driveway and the narrowness of the existing westbound curb lane represents a potential safety risk. A westbound auxiliary lane would facilitate traffic movement and thereby enhance traffic safety.~~

***In the opinion of the City Traffic Engineer, the narrowness of the existing westbound curb line coupled with the existing driveway and proposed main driveway serving the hospital represents**

a potential traffic safety risk. A westbound auxiliary lane would facilitate traffic movement and access and thereby enhance traffic safety for project and non-project traffic.

Mitigation measures required for this alternative therefore should include widening the north side of "H" Street to provide for an interim auxiliary right turn lane that eventually could be utilized for the third westbound lane required to bring "H" Street to its ultimate six-lane cross section."

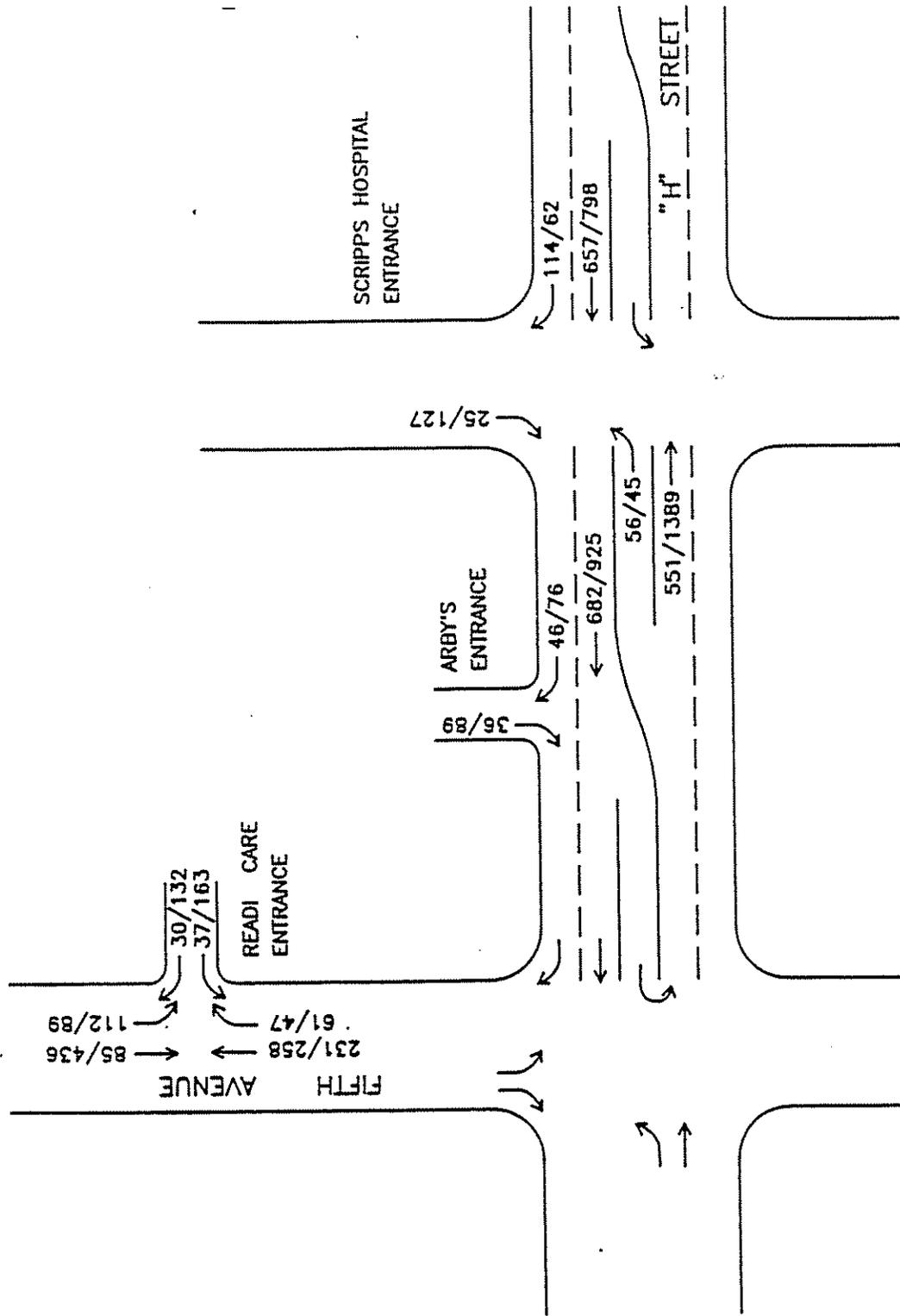


Figure 28

Scripps Memorial Hospital Expansion
Year 1995 & H St. Business Coalition Alt. Driveway Turning Movements

Table 11
Comparison of Intersection Operations by Alternative

Intersection	Existing				1995 + Phase 1				1995 + Phase 1 + H Street Coalition			
	AM		PM		AM		PM		AM		PM	
	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS
H Street/Fourth Avenue	0.50	A	0.78	C	0.56	A	0.86	D	0.56	A	0.87	D
H Street/Fifth Avenue	0.44	A	0.60	A	0.48	A	0.70	B	0.49	A	0.72	C
G Street/Fourth Avenue	0.54	A	0.75	C	0.59	A	0.83	D	0.59	A	0.84	D
G Street/Fifth Avenue	0.61	B	0.73	C	0.62	B	0.77	C	0.63	B	0.79	C

ICU = Intersection Capacity Utilization
 LOS = Level of Service

Table 12 Level of Service for Project Access Locations				
	AM Peak Hour		PM Peak Hour	
Intersection	Left Turn from Major	Left Turn from Minor	Left Turn from Major	Left Turn from Minor
1995 + Phase 1 + *H Street Business Coalition				
<u>H Street</u> main driveways	A	A	A	A
<u>H Street</u> Arby's driveway	N/A	A	N/A	A
<u>Fifth Avenue</u> Readi Care driveway	A	A	A	E

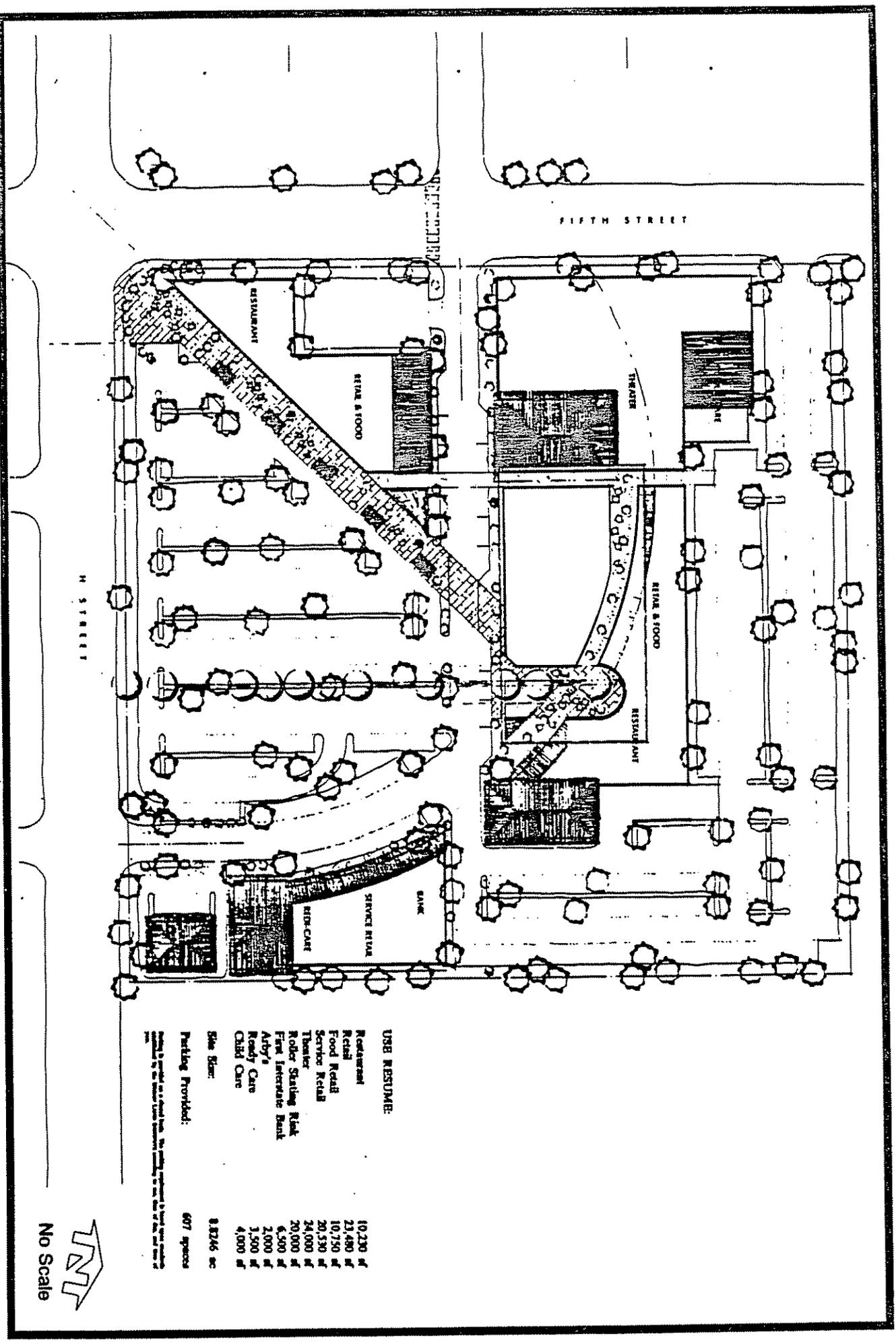
-- Noise/Air Quality

With the additional traffic associated with the retention of the commercial buildings on-site, impacts associated with noise and air quality may occur. This alternative would generate 1,614 more trips during Phase 1 than would the proposed project resulting in greater noise on area roadways and air pollutant emissions when compared with the proposed project. Given that these trips would be generated by existing uses, and that the trips would be generated regardless of where the businesses are located, the contribution of this alternative to noise and air quality effects is not regarded as significant. Mitigation measures incorporated into the proposed project for noise and air quality would also be incorporated into this alternative. However, retention of commercial uses on site adjacent to hospital uses may create a less tranquil environment for patients that are staying at the hospital.

6.4 RETAIL & ENTERTAINMENT ALTERNATIVE

Under this alternative, the 8.9 acre hospital expansion area as proposed in the current project would be as an expanded and redeveloped commercial area (see Figure 29). The expanded

**Scripps Memorial Hospital Expansion
Retail & Entertainment Alternative**



NTR
No Scale

**Figure
29**

commercial uses proposed on-site would include restaurants, convenience restaurants, a theater, a roller skating rink, a bank, a readicare and a child care facility. Currently, approximately 109,950 square feet of commercial uses are present on the site, of which 80,600 square feet is the swap meet building which has been re-leased to Jetco Furniture and other concessionaires. Under this alternative, a total of 124,990 square feet of active commercial uses would be provided. These uses would be consistent with the General Plan and meet the goals and objectives of the Town Centre II Redevelopment Plan.

Although the existing hospital would remain under this alternative, no hospital expansion would occur. This alternative would not implement the proposed project but would represent an alternative use for the site.

It is unclear under this alternative if the northwest portion of the site would be dedicated to the Sweetwater Union High School District for construction of a junior high school classroom in this area as is planned with the proposed project. If this alternative is selected, discussion with the school district would need to take place regarding provision of space for a junior high classroom. ~~If it is not dedicated, impacts to the Sweetwater Union High School District may occur with redevelopment of the site.~~ Potential health impacts as discussed in the EIR for the hospital expansion would not occur under this alternative since no hospital expansion would occur, however these impacts were not considered significant or unmitigable. Potential retail and entertainment uses under this alternative would need to be evaluated with respect to compatibility with the adjacent junior high school to the north. Impacts with respect to geology/soils, water conservation and schools would be the same under this alternative as under the proposed project. If this alternative is selected, further environmental and design review would be required and these impacts would be addressed at that time.

-- Land Use/Community Character/Visual Quality

Under this alternative, the hospital expansion project would not occur, and instead retail and entertainment uses would occur on the 8.9 acre parcel located at the corner of Fifth Avenue and H Street. These uses are consistent with both the Chula Vista General Plan and the Town Centre II Redevelopment Plan goals and objectives. No community

character impacts would be anticipated with this alternative since on-site commercial uses serving the community would be retained. However, compatibility of potential retail and entertainment uses and the adjacent junior high school should be evaluated.

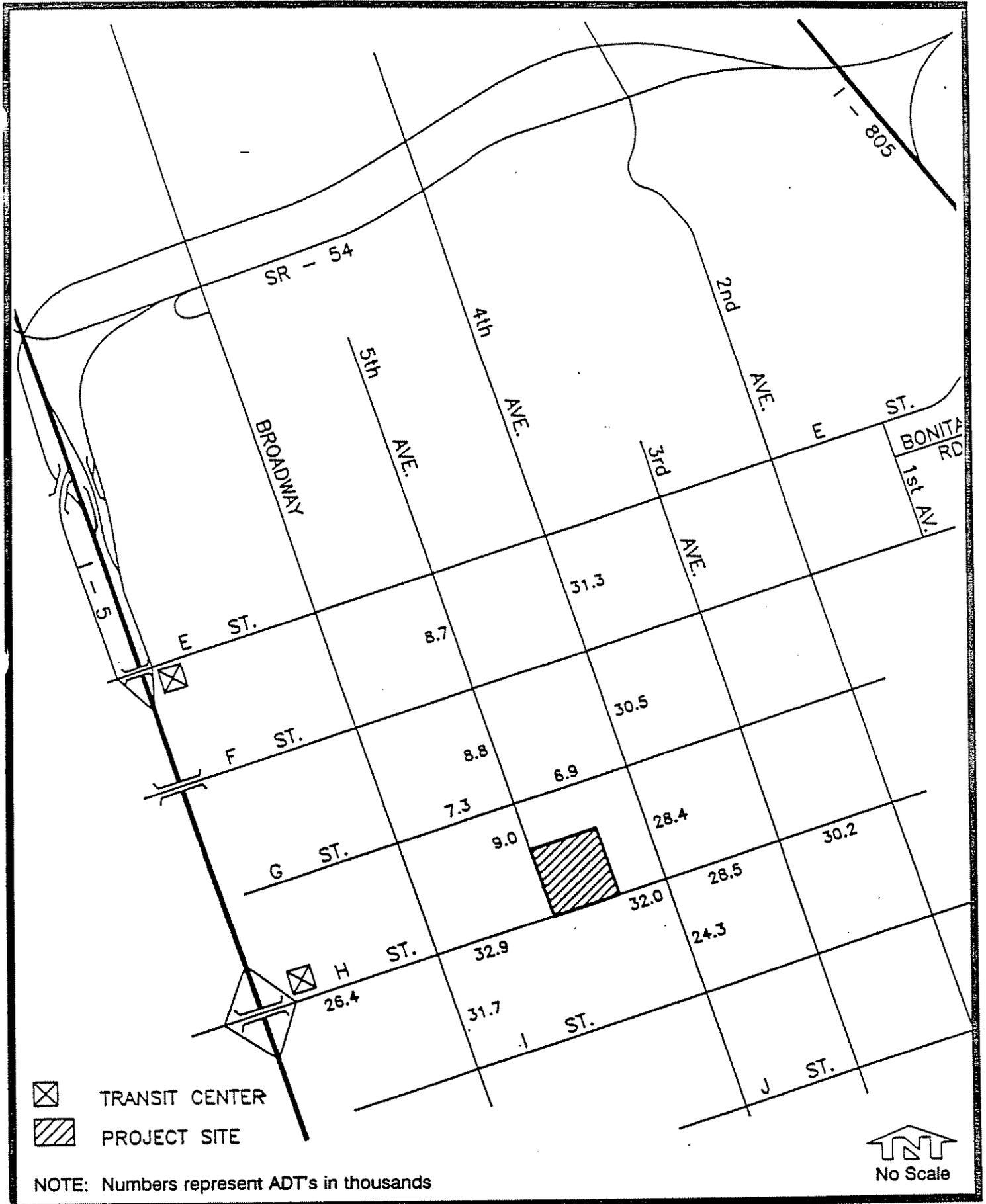
Since a detailed design has not been developed for this alternative, potential visual effects cannot be examined in detail. It is assumed that the proposed new commercial structures would be of a lower profile than the 4-6 story hospital and medical office structures proposed by the project. Visual changes associated with the bulk and scale of the structures proposed for the hospital expansion would not occur under this alternative.

Development and landscape plans under this alternative would be subject to review and approval by the city's Design Review Committee (DRC) and Landscape Architect, respectively. Such review would facilitate preparation of plans in conformance with City standards and guidelines.

-- Traffic

In July, 1991, Willdan Associates completed a traffic study addendum for this alternative to analyze the impacts to the four intersections analyzed with the proposed project and the access to and from the site under this alternative. The full traffic analysis is included in Appendix B to this EIR and summarized below.

As shown on Table 13, under this alternative, approximately 12,313 ADT would be generated from the project site with 574 trips (splitting 325 inbound and 249 outbound) during the AM peak hour and 1,056 trips (splitting 580 inbound and 476 outbound) during the PM peak hours. This would contrast with the 9,000 daily trips which would be generated by the proposed project at buildout. Figure 30 illustrates the short term year 1995 and retail and entertainment alternative ADT's in the project vicinity.



**Scripps Memorial Hospital Expansion
Year 1995 & Retail Entertainment Alt. ADT's**

**Figure
30**

Table 13
Trip Generation Retail & Entertainment Alternative

Land Use	Intensity (sq.ft.)	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Restaurant	10,230	300/1,000	3,069	8	123	123	6	110	74
Retail	23,400	40/1,000	936	3	17	11	9	42	42
Food Retail	10,750	150/1,000	1,612	4	45	19	11	89	89
Service Retail	20,530	40/1,000	821	3	15	10	9	37	37
Theater	24,000	80/1,000	1,920	0.3	---	---	8	108	46
Roller Rink	20,000	40/1,000	800	4	19	13	9	43	29
First Interstate Bank	6,500	200/1,000	1,300	5	39	25	10	65	65
Arby's	2,000	700/1,000	1,400	4	34	22	8	56	56
Readi Care	3,500	50/1,000	175	6	9	2	10	5	13
Child Care	4,000	70/1,000	280	17	24	24	18	25	25
			12,313		325	249		580	476

Table 14 shows a comparison of intersection operations between the proposed project and the Retail and Entertainment alternative. As shown on Table 14, both the proposed project and the retail and entertainment alternative would lower the LOS levels at H Street/4th Avenue and G Street/4th Avenue from C to D. The LOS levels are similar between the proposed project and this alternative with the exception of the AM peak hour at the intersection of G Street and Fifth Avenue where the Retail and Entertainment Alternative would operate at LOS A and the proposed project would operate at LOS B.

In order to evaluate the proposed access from the Retail & Entertainment alternative, it was necessary to assign the AM and PM peak hour period trips to and from the respective driveways. Figure 31 depicts the year 1995 AM and PM peak hour turning movements at the respective driveway locations for this alternative. Table 15 summarizes the level of service for project access locations for this alternative. As

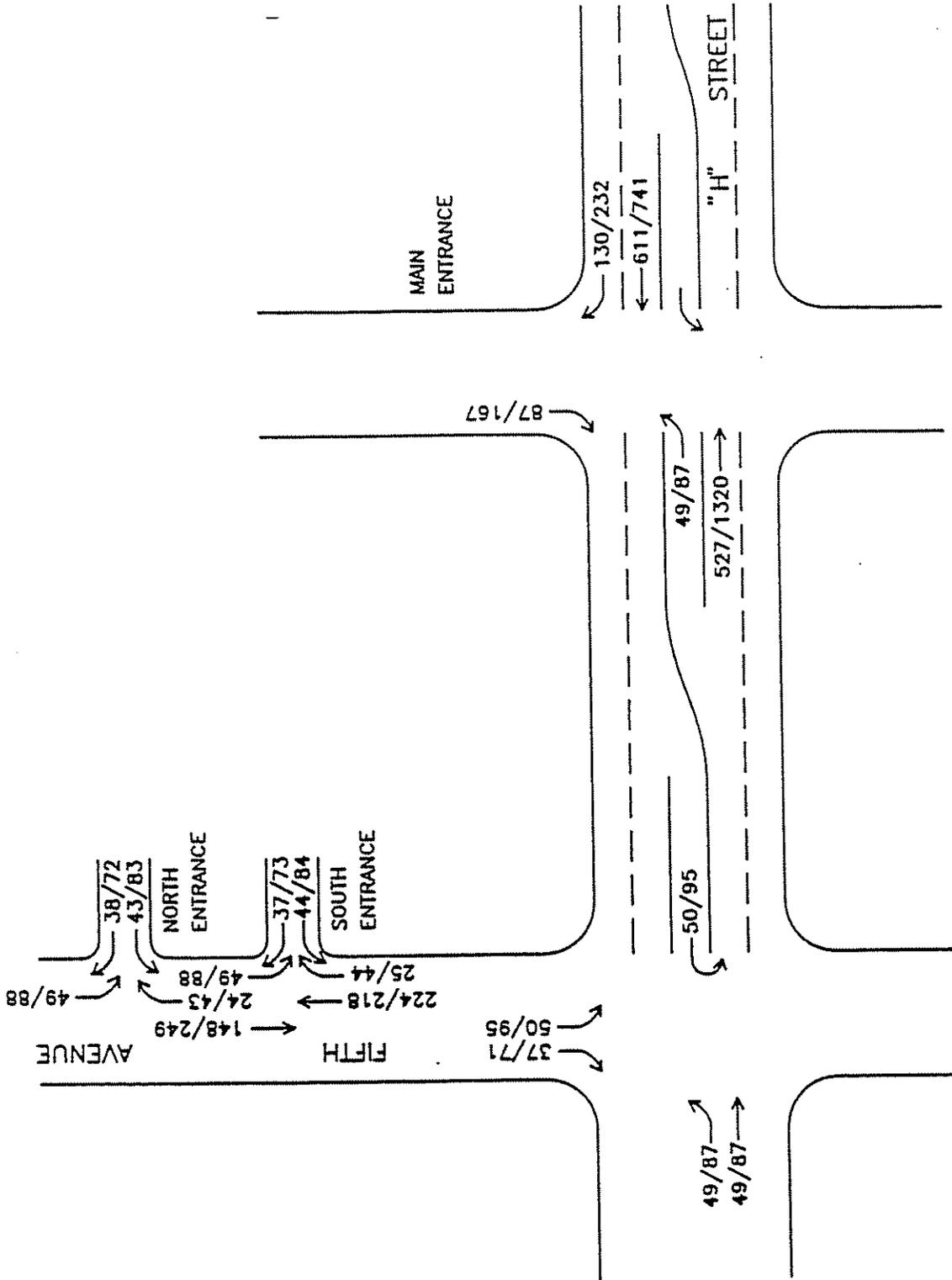


Figure 31

Scripps Memorial Hospital Expansion
Year 1995 & Retail Entertainment Alt. Driveway Turning Movements

Table 14
Comparison of Intersection Operations by Alternative

Intersection	Existing				1995 + Phase 1				1995 + All Commercial Alternatives			
	AM		PM		AM		PM		AM		PM	
	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS
H Street/Fourth Avenue	0.50	A	0.78	C	0.56	A	0.86	D	0.55	A	0.84	D
H Street/Fifth Avenue	0.44	A	0.60	A	0.48	A	0.70	B	0.47	A	0.67	B
G Street/Fourth Avenue	0.54	A	0.75	C	0.59	A	0.83	D	0.59	A	0.83	D
G Street/Fifth Avenue	0.61	B	0.73	C	0.62	B	0.77	C	0.59	A	0.78	C

ICU = Intersection Capacity Utilization
 LOS = Level of Service

shown on Table 15, it may be concluded that the access driveways proposed by this alternative would function in an efficient manner. It should be noted, by referencing the Retail and Entertainment Alternative Site Plan, that the main southbound left turning vehicles from Fifth Avenue would not have a left turn pocket due to transitions of the southbound Fifth Avenue left turn pocket at the H Street/Fifth Avenue signalized intersection. It should also be noted that the main driveway into the complex from H Street is proposed to contain left turns in and right turns in and out only. The proposed Arby's driveway would be restricted to right turns in and out only due to construction of a median in H Street. All driveways proposed to and from Fifth Avenue are proposed as full access driveways allowing left turns in and out as well as right turns in and out.

Table 15 Level of Service for Project Access Locations				
Intersection	AM Peak Hour		PM Peak Hour	
	Left Turn from Major	Left Turn from Minor	Left Turn from Major	Left Turn from Minor
1995 + Retail & Entertainment Alternative				
<u>H Street</u> main access	A	A	B	A
<u>Fifth Avenue</u> south driveway	A	A	A	B
<u>Fifth Avenue</u> north driveway	A	A	A	B

Due to the proximity of the hospital main driveway on H Street to the intersection of H Street and Fifth Avenue, widening the north side of H Street to provide an additional auxiliary access/right-turn lane to accommodate a raised median will be necessary.

-- Noise and Air Quality

This alternative would generate 6,150 ADT's, 1,350 fewer trips than anticipated in the General Plan at buildout. Fewer trips would result in reduced noise and air pollutant emissions in the project area.

6.5 REDUCED INTENSITY ALTERNATIVE

Visual changes associated with the proposed project include introduction of buildings with a greater mass than currently exist in the project area. In particular, the proposed medical office building along H Street and Fifth Avenue and the proposed parking structure along Fifth Avenue would differ from existing building elements in the vicinity. Although the EIR concludes that impacts associated with these visual changes would be mitigated by features incorporated into the project design, this option represents an alternative design which would avoid those visual changes.

Under this alternative, the medical office building would be reduced to 3 stories for each building wing. (Phase 1 and Phase Ultimate) and the project would lose approximately 46,500 square feet of office space. This translates into approximately 233 parking spaces less than the proposed project. The parking structure holds approximately 155 parking spaces per level and the structure could therefore be reduced by one level making it a 3-level (plus basement) parking structure with this alternative.

Assuming a trip generation rate of 50 trips per thousand square feet for the medical office building, 2,325 fewer trips would be generated under this alternative. The lower trip generation would result in a concomitant reduction in noise and air pollutant emissions. Although no significant unmitigated noise and air quality impacts have been identified for the proposed project, anticipated changes would be less under this alternative.

Other population-dependent impacts would also be reduced somewhat under this alternative since the reduced medical office square footage would result in fewer employees. Indirect student generation and water consumption would be less under this alternative than under the proposed project.

Impacts associated with physical changes would be the same under this alternative as for the proposed project. Changes to community character and attendant business relocation requirements would be similar as would potential concerns with respect to geology/soils. Health effects associated with hazardous waste and infectious waste would not change. The medical office use is the primary taxable entity associated with the proposed project. With the 46,500 square foot reduction (37.5%) in office space under this alternative, revenue to the City would be less than for the proposed project.

6.6 ALTERNATIVE SITE LOCATION

As noted in Section 2.0, a primary goal of the proposed project is to expand the existing Scripps Hospital facility at its existing location. This goal could not be achieved by relocating the project to an alternative site although an alternative site would not preclude the possibility of developing a full service Scripps Hospital facility at another location.

In general, the portion of Chula Vista west of I-805 including areas within the City's urban core are already developed and a 13-acre vacant site does not exist which would accommodate the project as proposed. Large areas of vacant land exist east of I-805 in the City's Eastern Territories. A variety of planned communities are emerging in the Eastern Territories including Eastlake, Rancho del Rey, and Otay Ranch which may include sites that would be suitable for a hospital complex. A hospital complex east of I-805 would likely serve a different market area than does the existing hospital in central Chula Vista. According to the applicant, the existing hospital facility is currently overcrowded and patients are going outside Chula Vista to receive medical care. Implementation of the project at an alternative site east of I-805 would serve future residents in that area but not reduce overcrowding at the existing facility in central Chula Vista.

Another alternative site option which has been investigated by the applicant would involve expansion of the hospital to the north and east rather than onto the western 8.9 acre parcel. Existing uses to the east include apartments, the Chula Vista Medical Center and a small office building along H Street which is owned by the applicant. The area immediately north of the existing hospital facility is currently utilized by the Sweetwater High School District for a junior high school site and is not owned by the applicant. Acquisition of the private properties and demolition of existing structures would be required to implement a hospital expansion to the north and east. Since these properties are not within a redevelopment area, as is the western 8.9 acre parcel, it is assumed that City assistance would not be provided to assemble the required land.

Environmental impacts associated with the alternative sites would likely be similar to those identified for the proposed project although, in the absence of specific site information, a detailed analysis cannot be completed. Since much of the Eastern Territories is currently undeveloped and still overlain with native vegetation, biological and cultural resource impacts could result from development of an alternative site in the Eastern Territories. Currently, the Chula Vista Community Hospital is located in the eastern territories (off Telegraph Canyon Road) and Kaiser Permanente is presently proposing a hospital site in Eastlake Village. The Kaiser project is just beginning the environmental review process through the City of Chula Vista.

7.0 INVENTORY OF MITIGATION MEASURES/MONITORING PROGRAM

Listed below are the mitigation measures which shall be made conditions of project approval. A draft mitigation monitoring program in accordance with the requirements of AB 3180 (PRC 21081.6) is presented in Table 16.

7.1 LAND USE/COMMUNITY CHARACTER

As no significant land use/community character impacts are expected to occur, no mitigation will be required.

7.2 VISUAL QUALITY

The following measures have been incorporated into the project design to mitigate visual impacts.

- All structures will be within the 100-foot height limit established by the City of Chula Vista for the Town Centre II Redevelopment Area;
- The medical office building at the corner of H Street and Fifth Avenue will range from 4-6 stories in height with the 4-story element located along the roadways and the larger, 6-story element set back a minimum of 100-feet from Fifth Avenue and H Street to reduce the apparent bulk and scale of the structure. The 4-story building element will be set back a minimum of 25 feet from Fifth Avenue and 45 feet from H Street.
- New hospital structures will be limited to 3 stories in height and, in general, will be set back a minimum of 180 feet from H Street. An exception is a 3-story administration building which would be constructed on the site of the existing hospital building during the ultimate phase of development. The administration building will be set back 48 feet from H Street.

- The parking structure along Fifth Avenue will be set back a minimum of 25 feet from the roadway. Architectural elements have been incorporated in the design of the parking structure to reduce the apparent scale of the facility.
- All project plans shall be subject to review and approval by the City's Design Review Committee (DRC). The DRC reviews projects for consistency with the overall urban design goals of the Chula Vista General Plan and relevant Area Plans.

7.3 TRAFFIC & PARKING

- Dedicate ultimate right-of-way on H Street from the easterly end of the project to Fifth Avenue to meet the City's design standards.
- Dedicate ultimate right-of-way along Fifth Avenue along the project frontage and construct a northbound access lane.
- Construct a raised median along H Street between existing improvements at Fourth Avenue and Fifth Avenue.
- Widen the north side of H Street along the project frontage of H Street to provide sufficient width for incoming and outgoing traffic to and from the project drives east to westbound "U" turns.
- Widen 5th Avenue prior to the occupancy of the second phase of the medical office building, complete the widening on the northside at the project frontage of H Street between Fourth Avenue and Fifth Avenue to provide a continuous third westbound lane..
- Demolition of a portion of the existing office building would be required in order to accomplish the widening along the entire H Street frontage.

- Pay traffic signal impact fees to the City of Chula Vista in accordance with City policy for upgrading of traffic signals within the western portion of Chula Vista resulting from increasing traffic volumes.

7.4 NOISE

- HVAC Equipment

The remaining HVAC and standby power equipment should be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The planned enclosure for the standby power unit may provide the necessary noise reduction depending upon the details of construction. Implementation of the above measure would enable the proposed project to meet State of California noise guidelines and mitigate noise impacts to below a level of significance.

7.5 HEALTH

- Scripps Memorial Hospitals, including the Chula Vista Hospital, has an established infectious waste control program. A copy of the program is included as Appendix E to this document. Upon approval, the infectious waste control program for the Chula Vista Hospital will be updated to reflect the approved hospital design and any changes to the hospital's infectious waste disposal schedule.

- To reduce any potential impacts associated with hazardous waste contamination, a UST removal plan would be prepared prior to the issuance of grading permits. The plan would include contingency measures in case the waste tank is not empty as determined by on-site investigations, or undetected leaking has occurred associated with the storage tank.

- An environmental audit will be prepared by a certified consultant to determine if asbestos materials are found in any of the buildings scheduled for demolition with implementation of the proposed project. If asbestos is found to occur on-site, it would be removed by qualified personnel prior to demolition of the buildings.

7.6 AIR QUALITY

Short-term construction phase impacts would be associated with the proposed expansion of the hospital, and implementation of standard dust control measures would be required to mitigate these impacts.

7.7 GEOLOGY/SOILS

The following mitigation measures have been developed to reduce impacts associated with seismic and soil type conditions on-site with construction of the hospital expansion, medical office building and parking structure. This list is a summary of the measures recommended, a full set of measures are included in the geotechnical report included as an appendix to this document.

- Expansion potential for formational mudstone: Various options are available to mitigate potential expansion of the formational mudstone on-site. These options include:
 - o the placement of a layer of low-expansion potential sandy soil beneath slabs-on-grade.
 - o moisture conditioning of the near surface soils,
 - o deepened slab edges, and/or special slab reinforcement.

Potentially expansive soils also require thicker than normal pavement sections.

- Foundation considerations: Specific recommendations for foundations are contained in the Robert Prater Associates geotechnical feasibility study. Specific measures are

required to create adequate foundations for future structures that would be located over the different types of soils located on-site.

- Seismic considerations: According to Robert Prater Associates, the subsurface soil conditions located on-site and the location of the site, are not conducive to soil liquefaction, seismically induced waves such as tsunamis and seiches, inundation due to dam or embankment failure, landsliding, lateral spreading, differential compaction, or ground cracking phenomena often associated with seismic activity. However, during a major earthquake, strong ground shaking of the site would most likely occur. To mitigate possible damage to structures on-site, the structural design of the medical office and hospital facility shall be designed in conformance with Chapter 23 of the Uniform Building Code. Further review of the hospital building structural design based on geologic information shall be completed at the State level by the Department of General Services, Office of the State Architect (OSA). OSA requires detailed geologic, seismic, and geotechnical studies be performed for new hospital facilities in the State of California. The report for this work must be reviewed by OSA prior to implementation of the project.

7.8 WATER CONSERVATION

Measures have been incorporated into the project design to reduce water consumption. These measures include landscaping with low water usage plant species, low water irrigation systems and compliance with State standards for water conservation. Final landscape plans demonstrating incorporation of water conservation measures will be subject to review and approval by the City of Chula Vista staff prior to issuance of building permits for the proposed project.

7.9 PUBLIC FACILITIES/SERVICES

The following mitigation measures have been established to reduce impacts to below a level of significance.

Storm Drain Improvements

- The proposed project shall correct storm drain flooding problems affecting the adjacent junior high school by ducting the storm drain into the hospital's proposed storm drain system.
- The proposed storm drain system shall be constructed in accordance with Chula Vista Drainage Standards and shall connect to the existing system in Fifth Avenue per said plans.
- Development of the subject site must comply with all applicable regulations established by EPA as set forth in the National Pollutant Discharge Elimination System permit requirements for storm water discharge.
- A technical report will be completed to the satisfaction of the City Engineer addressing storm drain issues and the results will be incorporated as conditions of project approval.

Fire Protection Services

The proposed project would be constructed in compliance with Chula Vista Fire Department standards, including:

- All buildings will contain an approved standpipe and fire sprinkler system, including the parking structure, and a fire alarm system.
- Additional fire hydrants will be installed as required by the Chula Vista Fire Department.
- All State Fire Marshall CAC - Title 19 regulations shall be met.
- Provision of a 26-foot wide access road into Chula Vista Junior High School from the north interior road off of Fifth Avenue.

Sewer Improvements

Preparation of a technical report addressing the following items will be required:

- Average daily wastewater flow from the project.
- Peak wastewater flow from the project and the time and day of week when peak flow is expected to occur.
- Hydraulic analysis of the impact that peak flow will have on existing sewer lines from point of connection to the wastewater flow metering station. Existing flows shall be included.
- Recommendations for any improvements necessary to maintain flow in the sewers in accordance with City of Chula Vista design standards.

Schools

In accordance with State law, the applicant shall pay school fees in the amount of \$0.25/square foot.

TABLE 16
DRAFT MITIGATION, MONITORING AND REPORTING PROGRAM

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
Visual Quality				
<p>1. Utilizing a series of design policies adopted by the City of Chula Vista, DRC will ensure that project design such as landscaping, architectural design treatment and the decrease of the height level of the Phase I Medical Office Building are carried out by the applicant.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; City Landscape Architect; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>2. All structures will be within the 100-foot height limit established by the City of Chula Vista for the Town Centre II Redevelopment Area;</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>3. The medical office building at the corner of H Street and Fifth Avenue will range from 4-6 stories in height with the 4-story element located along the roadways and the larger, 6-story element set back a minimum of 100-feet from Fifth Avenue and H Street to reduce the apparent bulk and scale of the structure. The 4-story building element will be set back a minimum of 25 feet from Fifth Avenue and 45 feet from H Street.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>4. New hospital structures will be limited to 3 stories in height and, in general, will be set back a minimum of 180 feet from H Street. An exception is a 3-story administration building which would be constructed on the site of the existing hospital building during the ultimate phase of development. The administration building will be set back 48 feet from H Street.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; Current Planning; MCC</p>	<p>City Planning Department</p>

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
<p>5. The parking structure along Fifth Avenue will be set back a minimum of 25 feet from the roadway. Architectural elements have been incorporated in the design of the parking structure to reduce the apparent scale of the facility.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>6. The primary entrance to the parking structure, off of Fifth Avenue will be recessed from the street and a safety bar will be provided.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>7. All project plans shall be subject to review and approval by the City's Design Review Committee (DRC). The DRC reviews projects for consistency with the overall urban design goals of the Chula Vista General Plan and relevant Area Plans.</p>	<p>Design review requirements will be incorporated into the Phasing CUP master plan and the Owner Participation Agreement to ensure that the proposed measures are carried out.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Planning; City Community Development Dept; City Planning Dept; Environmental Review Coordinator; City Landscape Architect; Current Planning; MCC</p>	<p>City Planning Department</p>
<p>8. Street trees approved by the City's Landscape Architect will be planted along the inner and outer perimeters of the medical office building.</p>	<p>City Landscape Architect will review the landscape plans for compliance.</p>	<p>Prior to construction/prior to grading and permit issuance.</p>	<p>City Landscape Architect</p>	<p>City Landscape Architect</p>
<p>Traffic/Circulation Phase I</p>				
<p>1. 5th Avenue: Dedicate ultimate right-of-way along 5th Avenue along the project frontage and construct a northbound access lane.</p>	<p>City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.</p>	<p>During construction, prior to occupancy permit.</p>	<p>City Engineer</p>	<p>City Engineer</p>
<p>2. H Street: Dedicate ultimate right-of-way on "H" Street from the easterly end of the project to Fifth Avenue to meet City design standards.</p>	<p>City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.</p>	<p>During construction, prior to occupancy permit.</p>	<p>City Engineer</p>	<p>City Engineer</p>
<p>3. H Street: Construct a raised median along H Street between existing improvements at 4th and 5th Avenues.</p>	<p>City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.</p>	<p>During construction, prior to occupancy permit.</p>	<p>City Engineer</p>	<p>City Engineer</p>

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
4. H Street: Widen the north side of H Street along the property frontage to provide sufficient width.	City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.	During construction, prior to occupancy permit.	City Engineer	City Engineer
5. Pay traffic signal impact fees to the City of Chula Vista in accordance with City policy for upgrading of traffic signals within the western portion of Chula Vista resulting from increasing traffic volumes.	City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.	During construction, prior to occupancy permit.	City Engineer	City Engineer
6. Complete the widening on the northside at the project frontage of H Street between 4th and 5th Avenue to provide a continuous third westbound lane. Demolition of an existing office building would be required in order to accomplish the widening along the entire frontage.	City Engineering Department will review project plans. Improvements will be constructed by the developer prior to occupancy.	Prior to occupancy permit for the second phase of the medical office building.	City Engineer	City Engineer
Noise				
1. The HVAC and standby power equipment will be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final.	City Engineering Department will review the noise analysis completed for the HVAC and standby power equipment to ensure compliance with hourly noise limits.	Prior to grading permit.	City Engineering Department	City Engineering Department
Health				
1. Scripps Hospital will update their infectious waste control program and revise their infectious waste disposal schedule to reflect the expanded hospital facility.	The County Hazardous Materials Management Division shall be responsible for inspecting the Scripps infectious waste control program and revised disposal schedule on an annual basis.	Prior to issuance of grading permit.	County Hazardous Materials Management Division	City Building Department
2. Scripps Hospital will prepare a UST removal plan including contingency measures in case of hazardous waste contamination with removal of the waste and storage tanks not detected in the preliminary on-site investigation.	The County Hazardous Materials Management Division shall be responsible for reviewing and approving the UST removal plan and will be present during tank removal.	Prior to issuance of grading permit.	County Hazardous Materials Management Division	City Building Department
3. Scripps Hospital will prepare an environmental audit to determine if asbestos is found on-site in structures that would be demolished with project implementation. If asbestos is found on-site, a qualified consultant would remove the asbestos to the satisfaction of the City of Chula Vista prior to demolition.	City Engineering Department and Cal OSHA will be responsible for ensuring that testing and removal of any asbestos is completed in compliance with State and Federal regulators.	Prior to grading permit.	City Engineering Department	City Engineering Department
Public Services/Facilities				

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
<p><u>Storm Drain Improvements</u></p> <p>1. The proposed project shall correct storm drain system and constructed in accordance with Chula Vista Drainage Standards and shall connect to the existing system in 5th Avenue per said plans.</p>	<p>Engineering plans shall include the storm drain improvements, City engineers will verify and approve the plans. Field engineer will verify in the field.</p>	<p>During construction, prior to occupancy permit.</p>	<p>City engineering, field engineer</p>	<p>City Engineering Department</p>
<p>2. Development of the subject site must comply with all applicable regulations established by EPA as set forth in the National Pollutant Discharge Elimination System permit requirements for storm water discharge.</p>	<p>City Engineering Department will review project plans to ensure that applicable regulations are complied with.</p>	<p>Prior to grading permit.</p>	<p>City Engineering Dept; Regional Water Quality Control Board (if necessary)</p>	<p>City Engineering Department</p>
<p>3. A technical report will be completed to the satisfaction of the City Engineer addressing storm drain issues and the results will be incorporated as conditions of project approval.</p>	<p>City Engineering Department will review project plans to ensure that applicable regulations are complied with.</p>	<p>Prior to grading permit.</p>	<p>City Engineering Dept; Regional Water Quality Control Board (if necessary)</p>	<p>City Engineering Department</p>
<p><u>Sewer Improvements</u></p> <p>1. Preparation of a technical report addressing the following items will be required:</p> <ul style="list-style-type: none"> -- Average daily wastewater flow from the project. -- Peak wastewater flow from the project and time and day of week when peak flow is expected to occur. -- Hydraulic analysis of the impact that peak flow will have on existing sewer lines from point of connection to the wastewater flow metering station. Existing flows shall be included. -- Recommendations for any improvements necessary to maintain flow in the sewers in accordance with City of Chula Vista design standards. 	<p>Mitigation is a condition of project approval.</p>	<p>Prior to grading permit.</p>	<p>City Engineering Department</p>	<p>City Engineering Department</p>

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
<p><u>Fire Protection Services</u></p> <p>1. The proposed project shall be constructed in compliance with Chula Vista Fire Department standards, including:</p> <ul style="list-style-type: none"> -- All buildings will contain an approved standpipe and fire sprinkler system including the parking structures, and a fire alarm system. -- Additional fire hydrants shall be installed as required by the Chula Vista Fire Department. -- All State Fire Marshall CAC-Title 19 regulations shall be met. -- Provision of a 26-foot wide access road into Chula Vista Junior High School from the north interior road off of Fifth Avenue. 	<p>Chula Vista Fire Department will review project plans for standard compliance.</p>	<p>Prior to grading permit.</p>	<p>Chula Vista Fire Department</p>	<p>Chula Vista Fire Department</p>
<p><u>Schools</u></p> <p>1. In accordance with State law, the applicant will pay school fees in the amount of \$0.25/square foot of development.</p>	<p>City Planning Department will ensure payment of fees.</p>	<p>Prior to occupancy permit.</p>	<p>City Planning Department</p>	<p>City Planning Department</p>
<p><u>Geotechnical</u></p> <p>1. The "Geotechnical Investigation for the Scripps Phase 1 Expansion" prepared by Robert Prater Associates must be reviewed and approved by the City's Engineering Department. All recommendations contained within the study must be implemented by the applicant. This measure must be made a condition of project approval and must be included (or referenced) on the Grading Plan.</p>	<p>Engineering Department must review the plan and on-site monitoring shall take place during grading and construction.</p>	<p>Prior to and during construction, prior to issuance of building permit for non-structural measures.</p>	<p>City Engineer, City Engineer Field Supervisor</p>	<p>City Engineering Department</p>
<p>2. Structural design of the medical office and hospital facility shall be designed in conformance with Chapter 23 of the Uniform Building Code.</p>	<p>Engineering Department must review the plans for compliance.</p>	<p>Prior to grading permit.</p>	<p>City Engineer</p>	<p>City Engineering Department</p>
<p>3. Further review of the hospital design shall be completed at the State level by the Department of General Services, Office of the State Architect (OSA). OSA requires detailed geologic, seismic and geotechnical studies be performed and approved by them prior to implementation of the project.</p>	<p>Chula Vista Engineering will submit required information to OSA for their review.</p>	<p>Prior to grading permit.</p>	<p>City Engineering Dept./ OSA</p>	<p>City Engineering Department</p>

Mitigation Measures	Monitoring Activity	Timing	Responsibility for Monitoring and Reporting	Verification Responsibility
Air Quality				
1. The project will incorporate City Standards for dust control during the construction phase of the project, including regular watering and dust abatement measures required by APCD.	Chula Vista Engineering Department will be responsible for monitoring dust control to ensure measures are implemented on a weekly basis during the grading and construction phase.	During grading and construction.	City Engineering Department	City Engineering Department
Water Conservation				
1. The project will incorporate State standards for water conservation into project design.	Chula Vista Engineering Department will review project plans for compliance with State water conservation standards. On-site monitoring of the hospital during construction shall also take place.	During and after construction, prior to occupancy permit.	City Engineer, City Engineer Field Supervisor	City Engineering Department
2. Final landscape plans will include water conservation measures including low water use plant species and a water conserving sprinkler system.	Chula Vista Landscape Department will review final landscape plans for compliance and will conduct field visits after landscape implementation to ensure compliance with the approved landscape plan.	During and after landscape implementation and prior to occupancy permit.	City Landscape Architect	City Landscape Department

8.0 SOCIOECONOMIC/FISCAL ANALYSIS

8.1 FISCAL ANALYSIS

During the public review period of the previous Draft EIR for the project, the Chula Vista Planning Commission, as well as other commentors on the DEIR requested additional information concerning the economic aspects of the project especially as it related to revenues and the need for health care facilities. In order to evaluate fiscal effects associated with the proposed project, an economic analysis was completed by Dr. Jun Onaka of P&D Technologies, Inc. The economic analysis addressed the effects of the project when compared with two alternatives proposed by existing tenants - the H Street Business Coalition Alternative and the Circinus Corporation Retail and Entertainment Alternative. The proposed project, as well as those two alternatives, are addressed together in this section to facilitate comparative review. It should be noted that this economic analysis is completely separate from the CEQA environmental review and is included in this CEQA document for reference purposes only. The full economic analysis, which also discusses supply and demand needs for health care facilities in the region is included as Appendix G.

8.1.1 Existing Conditions

-- Commercial Retail and Taxable Sales

During 1989, total taxable retail sales in Chula Vista was \$872,629,000. This represented 5.9% of the total taxable retail sales in the county (Table 17). This share compares favorably with the shares of county totals represented by Chula Vista in population (5.2%), number of households (5.3%), and total household income (5.3%). That is, there are more retail expenditures in the City than would be expected solely from its residents. Among categories of retail stores, there are excess expenditures in all except packaged liquor stores, auto dealers and auto supplies, and "other retail." The "other retail" category consists primarily of specialty retail such as gift shops, bookstores, and others.

TABLE 17
TAXABLE RETAIL SALES IN CHULA VISTA, 1989
(In Thousands of Dollars)

	San Diego County	Chula Vista	Chula Vista's Share of Countywide Sales
Apparel Stores	\$ 787,646	\$ 46,302	5.9%
General Merchandise Stores	2,385,706	246,401	10.3%
Drug Stores	314,181	21,440	6.8%
Food Stores	1,205,124	78,154	6.5%
Packaged Liquor Stores	152,368	4,753	3.1%*
Eating and Drinking Places	1,920,620	104,999	5.5%
Homes Furnishing and Appliances	743,971	53,906	7.2%
Building Materials and Farm Implements	1,455,932	82,461	5.7%
Auto Dealers and Auto Supplies	2,721,863	69,487	2.6%*
Service Stations	1,165,791	80,515	6.9%
Other Retail Stores	2,030,655	84,211	4.1%*
TOTAL RETAIL STORES	\$ 14,883,857	\$ 872,629	5.9%

Source: California Board of Equalization; P&D Technologies

Note: * indicates categories of retail sales for which Chula Vista's shares of County totals are below average. See text for additional discussion.

Chula Vista Center is a regional shopping center located across H Street from the project site. The center was extensively renovated and expanded in 1988. Total taxable sales in 1989 was \$125,523,000, generated by gross leasable area (GLA) of 823,000 square feet. This represented average sales of \$153 per square foot, which was considerably less than Plaza Bonita (\$218 per square foot) or Fashion Valley (\$210 per square foot).

The above data indicate that the city may have largely satisfied the demand for common shopping center and strip commercial uses. In order to obtain substantial, additional

gains in taxable sales, unique approaches will be required. One approach, which is already used by Chula Vista, is to encourage the development of high-volume, off-price retail stores, which attract customers from distant areas.

There are 109,950 square feet of existing commercial uses on-site. Among these uses, a major generator of taxable sales is Arby's. It is estimated that this restaurant generates sales in excess of \$1,000,000 per year, resulting in sales tax revenues to Chula Vista of \$10,000 per year. (Gale Mcleod, pers. comm.). Other retail outlets on-site are estimated by the City of Chula Vista to generate sales of approximately \$2,150,000 per year, resulting in a total of \$3,150,000 per year in sales.

-- Property Tax and Tax Increment Revenues

The project area consists of 9 assessor's parcels totalling 388,125 square feet or 8.91 acres. The area was included in the amended Chula Vista Town Center II Redevelopment Project boundary in 1988. For tax increment calculations, the base year is fiscal year (FY) 1987-88. The total assessed value in the base year was \$3,148,443 (Table 18). By agreement with the County of San Diego, the Redevelopment Agency would receive 100% of tax increment revenues for 25 years, from FY 1988-89 to FY 2012-13. Thereafter, the County would receive 13.25% and the agency, 86.75%. In January 1991, the fee title to land in the project area was sold for \$2,141,145.

-- Employment

Total employment located in Chula Vista in 1988 was 47,233 (Table 19). This represented 4.1% of the countywide total, which is less than the city's share (5.3%) of the total population in the county. There is thus a net export of workers from the city, principally to the City of San Diego. Chula Vista has relatively high shares of employment in manufacturing, due to the presence of Rohr Industries, and in retail trade. The latter fact is consistent with the relatively high proportion of taxable sales which are recorded in the City.

**TABLE 18
PROJECT AREA ASSESSMENT ROLL, 1987-88**

Parcel No.	Land	Improvements	Total Assessment
568-370-30	\$ 4,966	\$ 20,112	\$ 25,078
568-370-31	21,297	332,761	354,058
568-370-32	2,479	41,415	43,894
568-370-33	4,966	56,563	61,529
568-370-34	125,551	37,627	163,178
568-370-40	12,539	129,221	141,760
568-370-42	20,112	212,174	232,286
568-370-47	848,371	1,129,720	1,978,091
568-370-48	10,612	137,957	148,569
T O T A L	\$ 1,050,893	\$ 2,097,550	\$ 3,148,443

Source: County of San Diego, Office of the Assessor.

**TABLE 19
EMPLOYMENT IN CHULA VISTA, 1988**

	San Diego County	Chula Vista	Chula Vista's Share of Countywide Jobs
Agriculture, Forestry, Fishing, Mining	27,007	243	0.9%
Construction	71,029	1,637	2.3%
Manufacturing	133,183	11,425	8.6%
Transportation, Communication, Utilities	38,695	1,199	3.1%
Wholesale Trade	44,054	1,602	3.6%
Retail Trade	199,125	11,946	6.0%
Finance, Insurance, Real Estate	73,635	2,306	3.1%
Services	282,602	9,874	3.5%
Government, Military	293,826	7,001	2.4%
T O T A L	1,163,156	47,233	4.1%

Source: San Diego Association of Governments

On-site, there are 8 existing businesses, with an estimated total of 58 full-time equivalent employment (Table 20). (Two part-time positions are assumed equivalent to one full-time position.) Although not on the project site, the existing hospital employs 556 persons, or about 4.2 employees per occupied bed.

TABLE 20 EXISTING EMPLOYMENT ON PROJECT SITE	
	Full Time Equivalent Employment
Arby's	14
Captain Kidd's	2
Express Gasoline	4
Farrell's Ice Cream Parlor	9
Fiesta Cinema	4
First Interstate Bank	10
Readicare Center	9
Rollerskate Land	6
T O T A L	58

Source: P&D Technologies

8.1.2 Analysis

-- Tax Revenue Effects

The proposed project and the two alternatives would result in significant additional revenues to the Redevelopment Agency and the City of Chula Vista, in comparison to retaining existing uses with no redevelopment. This section examines potential effects on four revenue sources which would see the most significant change: tax increment revenues, sales tax revenues, utility users tax, and franchise tax. Effects on other taxes

and on public service costs are anticipated to be of similar magnitudes for the proposed project and the two alternatives, hence are not included in the analysis.

Tax revenues are first estimated on an annual basis. For each alternative, revenues are projected for 30 years, from FY 1992-93 to FY 2021-22. The revenues are then discounted and summed to present values for comparison. Discounting is an accounting procedure in which future revenues are reduced in value, in the expectation that revenues available at present would generate interest income which would not be generated by future revenues. The discounted, or present, values provide a reliable method of comparing the economic worth of alternatives.

Table 21 is a summary of present values of the proposed project and alternatives, with variations as discussed below. The proposed project, when fully constructed, would generate revenues equal to about \$2.3 million in 1991 dollars. If only Phase 1 is built, and the ultimate phase is not built, this value would decline to about \$1.2 million.

	Tax Increment	Sales Tax	Utility and Franchise Taxes	Total	Difference From Proposed Project
Proposed Project	\$ 1,629,600	\$ 200,800	\$ 511,800	\$ 2,342,200	---
Proposed Project Without Ultimate Phase	811,100	153,800	199,700	1,164,600	(\$ 1,177,600)
H Street Business Coalition	1,645,500	232,500	512,900	2,390,000	48,700
Retail and Entertainment (60% New Sales)	1,667,200	1,105,400	61,200	2,833,700	491,500
Retail and Entertainment (30% New Sales)	1,667,200	596,100	61,200	2,324,500	(17,700)

The alternative proposed by H Street Business Coalition is essentially the same, from the perspective of tax revenues, as the proposed project. The additional years of taxes collected from existing establishments along H Street would increase revenues to the City by less than \$50,000.

The Retail and Entertainment Alternative could result in substantial revenues to the City. However, this alternative as presently proposed, is unclear in a number of important areas. Depending on the degree to which the retail center would divert sales away from the Chula Vista Center and other retail areas of the City, this alternative may not result in any more revenues to the City than the proposed project. If, in addition, the developers of this alternative were to seek financial assistance from the Redevelopment Agency, then this alternative would be less desirable than the proposed project.

Proposed Project

The proposed project would generate tax increment revenues from the acquisition and sale of the 8.91-acre property and construction of taxable facilities. The hospital and about two-thirds of the site would be exempt from property taxation. However, the medical office building would be taxable, as well as a portion of the proposed parking structure.

The hospital and the medical center would contain pharmacies, medical supply store, and gift and book shops, which would generate taxable sales. The hospital is a major user of electricity and natural gas, which are subject to the City's utility users tax and franchise tax. Projected energy consumption in excess of existing is included in the analysis.

A variation of the proposed project was examined, in which the ultimate phase is not built. The potential reduction in revenues is \$1.2 million.

H Street Business Coalition Alternative

This alternative is similar to the proposed project with respect to revenue effects. However, taxes paid by Arby's, First Interstate Bank, and Readicare Center would continue to be collected by the City until commencement of construction of the ultimate phase, which may be several years after the commencement of construction of Phase 1.

Retail and Entertainment Center Alternative

This alternative proposes to develop commercial uses on the project site. No hospital uses would occur. The alternative has been graphically depicted, with a summary of proposed uses. However, there are no market or financial feasibility analyses available for this plan. Such studies are necessary in order to resolve the following issues:

- o What is the probable share of sales at this center which would be new to the City?
- o What is the probable timing of land acquisition and development?
- o Would the project require any subsidy from the Redevelopment Agency?

Due to the fact that the City already generates more than its proportionate share of taxable sales in the County and that average sales at the recently renovated Chula Vista Center is \$153 per square foot, it is likely that a substantial portion of sales at this proposed center would be sales diverted from other areas in the City. In the absence of a market study, two scenarios were examined: One with share of new sales at 60% (i.e., 40% of sales are diverted from other stores in the City) and another with share of new sales at 30% (i.e., 70% of sales are diverted).

Based on the above, the total discounted value of tax increment, sales tax, utility users tax, and franchise tax would be \$2.8 million, or about \$490,000 more than the total discounted value of taxes for the proposed project. If the share of sales is 30% the

discounted value of these taxes would be \$2.3 million, which is the same as the proposed project.

If this alternative requires a subsidy from the agency, then, first, the share of sales, which would be new to the City and not diverted from other retail areas, must be large enough to generate a surplus of present value over the proposed project, and, second, the subsidy should not exceed such a surplus.

The above discussion does not consider the fact that the proposed project would create a much larger employment base than the retail alternative (see Employment Effects, below). When employment effects are considered along with revenues, the alternative to the proposed project must have a significantly higher present value before it can be regarded as comparable in economic worth.

-- Employment Effects

Proposed Project

Scripps Memorial Hospital plans to assign 4.0 employees per occupied bed in the expanded hospital. Based on an average occupancy rate of 73.4% (see Supply Effects included in the full economic analysis included as Appendix G to this document), it is anticipated that the expanded hospital would employ 757 persons. This represents an increase of 201 employees over the existing.

Employment in the medical office building is estimated to be 140 persons after Phase 1 and 280 after the ultimate phase. The estimates are based on an average space per employee of 444 square feet, the same as existing medical office building at Scripps Memorial Hospital in La Jolla.

The hospital expansion and the medical office building would ultimately create 481 new jobs, or an increase of 427 jobs over those currently on the project site. It should be noted, however, that existing employment would not be lost to the city, as they are expected to be relocated elsewhere in Chula Vista. A gain of 481 jobs would represent 1% of total employment in the City.

The projected growth in employment is a significant, positive effect of the proposed project, which would increase job opportunities in the urban core, increase retail expenditures and indirectly strengthen the economic base of the city.

H Street Business Coalition Alternative

Under this alternative, the ultimate effect on employment would remain the same as the proposed project. However, an estimated total of 27 workers would remain on-site for several years until the start of ultimate phase construction.

Retail and Entertainment Alternative

Proposed uses in this alternative include four facilities which already exist on-site: Arby's, First Interstate Bank, Readicare Center and a roller skating rink. These uses employ 33 persons. Other uses are restaurant, retail, theater and child care, for which 53 employees may be required. Altogether, this proposal is anticipated to support 86 jobs, of which 53 would be new jobs.

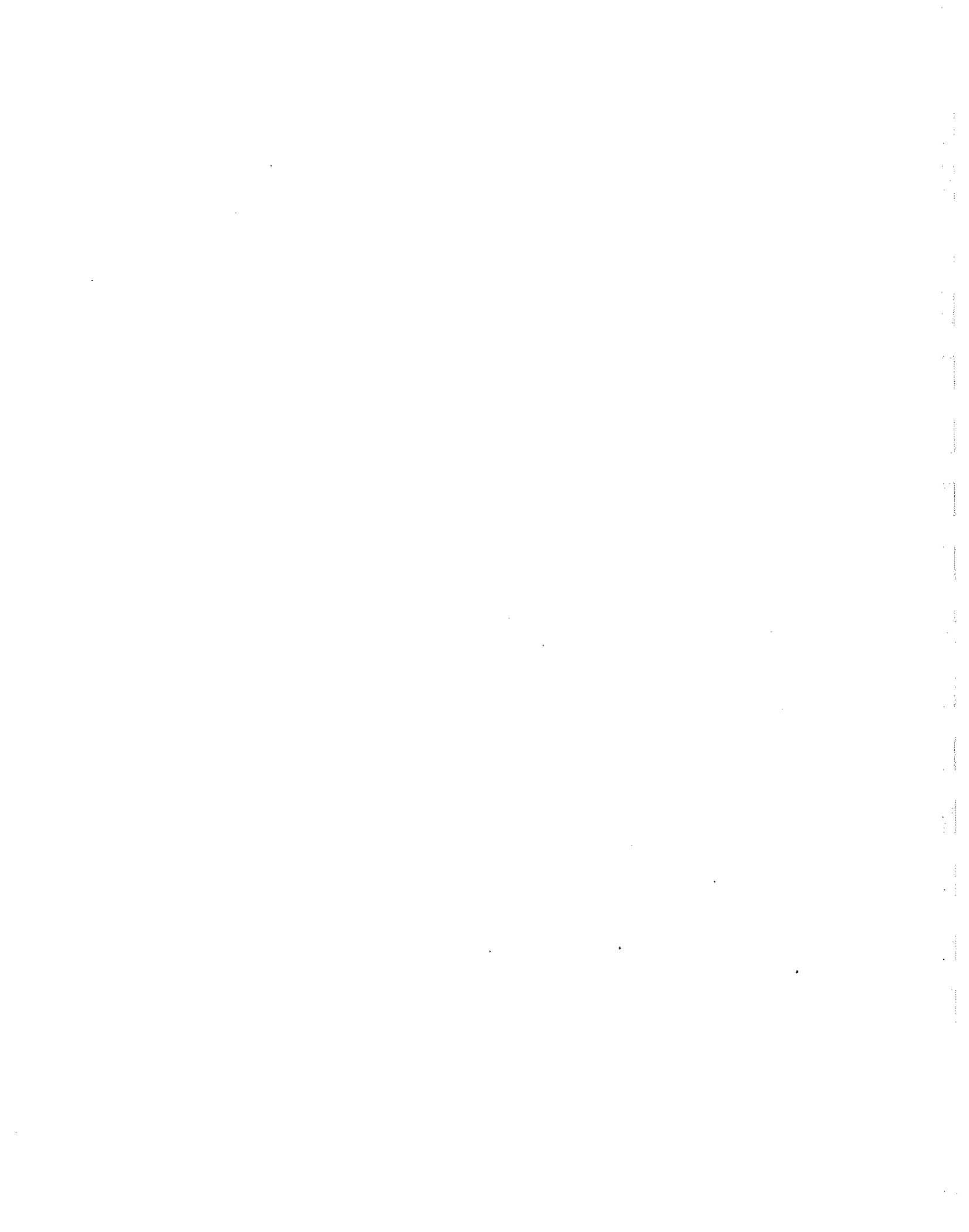
8.1.3 Recommendations

No negative economic effects are anticipated to occur as a result of the proposed project. However, the following measures are recommended in order to increase fiscal and economic benefits to the agency and the City:

- o Guidelines established by the City and the state should be strictly observed in the relocation of existing businesses. Appropriate assistance should be given to find new locations which are close to the existing and to retain existing clientele as much as possible.

- o The Redevelopment Agency should seek assurances from the hospital that either property taxes or in-lieu payments will be made, sum of which would be equal to 1% of the construction cost of the ultimate phase of medical office building and parking structure, even if the facilities are not constructed or are only partially constructed.

- o The City should review future proposals for construction or expansion of hospitals and other medical facilities, in order to balance supply with anticipated demand for such facilities.



9.0 REFERENCES

- * California Administrative Code - Title 22
- * Chula Vista, City of, 1987. Municipal Code
- * Chula Vista, City of, 1989a. General Plan Update. March
- * Chula Vista, City of, 1989b. General Plan Update EIR-88-2. March
- * Chula Vista, City of, 1988. Draft Supplemental EIR Towne Centre II Amendment, EIR 88-3. May, 1988.
- * Chula Vista, City of, 1978 Town Centre II Redevelopment Plan
- * Chula Vista, City of, 1989c. Status Report: Redevelopment of the Northeast Corner of Fifth & H.
- * Chula Vista, City of, 1988 Proposed 2nd Amendment to the Town Centre II Redevelopment Plan.
- * Robert Prater Associates, 1990 Limited Hazardous Waste Potential Assessment. January.
- * Robert Prater Associates, 1991 Geotechnical Investigations Scripps Hospital Expansion.
- * San Diego APCD, 1985 Air Quality in San Diego.
- * SDAPCD, 1990. Annual Report 1988-1989. San Diego.
- * SDAPCD, 1991. 1990 Air Quality Scorecard: Better Weather and Fewer Santa Anas Improve Air Quality. February 13. San Diego.
- * SDAPCD, 1990. Air Quality Monitoring Data. April 9. San Diego.
- * Southern California Earthquake Preparedness Project, 1989. Proceedings - The Seismic Risk in the San Diego Region: Special Focus on the Rose Canyon on Fault System. June 29-30, 1989 Workshop. San Diego.
- * California Department of Mines and Geology, 1975. Character and Recovery of Faulting, San Diego Metropolitan Area, California. Special Report 123.

10.0 INDIVIDUALS AND AGENCIES CONSULTED

- * Air Pollution Control District (APCD)
Randy Smith, Air Quality Inspector
- * California Department of Health Services (DHS)
- * California Department of Transportation
Foroud Khadem, Project Manager
- * City of Chula Vista
Lance Abbott, Community Development Specialist
Carol Gove, Fire Marshal
Luis Hernandez, Design Review Committee
Fred Kassman, Redevelopment Coordinator
Maryann C. Miller, Contract Planner, Environmental Section
Doug Reid, Environmental Review Coordinator
Hal Rosenberg, City Traffic Engineer
- * County Hazardous Materials Management Division
Matt Trainer, Duty Inspector
- * James Leary Architecture and Planning
Doug Childs, A.I.A.
Jim Leary, A.I.A.
- * Scripps Hospital
Sharon Sveningson, Environmental Department
Jamie Burns, Environmental Department
- * Weissburg and Aronson, Inc.
Ralph Kostant, Attorney

11.0 CONSULTANT IDENTIFICATION

This report was prepared by Dudek & Associates of San Diego, California, in consultation with Willdan Associates and San Diego Acoustics, Inc. Members of Dudek's professional staff and consultants contributing to the report are listed below:

Dudek & Associates

June Collins, Group Manager, Environmental Services
Kelli Rasmus, Environmental Scientist
Martie Clemons, Senior Graphic Artist
Tonette Foster, Word Processing Supervisor

Consultants

Joe Oliva and Ahmad Al Sughaiyer, Willdan Associates, Traffic Consultants
Ed Kamps, San Diego Acoustics, Noise Consultants
Jun Onaka, P&D Technologies, Economic/Fiscal Analysis

RESPONSES

TO

COMMENTS

SCRIPPS CHULA VISTA MEMORIAL HOSPITAL EXPANSION EIR RESPONSES TO COMMENTS

INTRODUCTION

The following responses to comments are for the August, 1991 recirculated Draft EIR for the Scripps Memorial Hospital Expansion project in the City of Chula Vista. All comments received during the public review period have been responded to. The recirculated DEIR requested that any comments or concerns associated with the DEIR should be submitted in a new comment letter. However, some comment letters that were received referenced past comment letters or included past comment letters as attachments. These past letters are also responded to in these responses to comments. In addition, letters received after the close of the public review period have been responded to.

As noted in the DEIR (page 165), commentators on the previously circulated Draft EIR, and members of the Planning Commission requested additional information concerning the economic aspects of the project. An economic analysis which also contains information on the market served by the existing and proposed hospital facility was completed and recirculated with the DEIR. The DEIR notes, however, that the economic analysis is completely separate from the CEQA environmental review and was included in the DEIR for reference purposes only.

The CEQA Guidelines (Section 15131) make the following statements with regard to the analysis of economic and social effects in EIRs. Economic or social information may be included in an EIR or may be presented in whatever form the agency desires.

- (a) Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect.

- (b) Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant ...

(Source: Guidelines for the California Environmental Quality Act, 14 Cal. Code Regs., Sec. 15131)

No economic or social effects have been identified for the proposed project which would contribute to the significance of other impacts identified in the DEIR. As discussed in Section 4.1 of the DEIR, Land Use, implementation of the proposed project would result in the elimination of existing commercial uses on the project site which could alter the character of the community in the project area. The DEIR concludes, however, that elimination of commercial uses associated with project implementation would not significantly alter the character of the community since similar commercial uses are located within one mile of the project site. It was determined, therefore, that the "social" effect associated with the project (e.g., elimination of commercial uses in the project area) would not contribute to the significance of overall community character impacts. It is also anticipated that the minimal loss of jobs with the elimination of the commercial uses would be offset by the employment opportunities an expanded hospital would bring to the area, and no social effects would occur.

No physical changes have been identified in the DEIR which would result from economic or social effects associated with implementation of the proposed project. As discussed in the DEIR, the Redevelopment Agency has requested that the applicant search for relocation sites for specific uses on the project site. Relocation sites for the remaining uses on the project site would be determined following execution of an Owner Participation Agreement between the Redevelopment Agency and the project applicant. The current status of relocation activities is as follows:

- The on-site cinema is proposed to be relocated to the expanded Chula Vista Shopping Center; an EIR is currently being prepared for the shopping center expansion (EIR 91-04, SCH #91051042).
- Scripps has purchased Farrell's interest.
- The roller rink is currently in escrow on a new site in the City of Chula Vista. No application for a conditional use permit or other entitlements for a new roller rink have been submitted to the City at this time.

The cumulative environmental impacts associated with the expanded Chula Vista Shopping Center (which includes the proposed theater) were analyzed in this recirculated DEIR. With regard to the roller rink, the owner of the rink is currently in escrow for new property to relocate the existing rink. However, an application for development of the roller rink has not been submitted and any analysis of impacts associated with the roller rink would be purely speculative. Once an application has been received and the full extent of the project known, environmental review in compliance with CEQA and its implementing Guidelines and the Guidelines of the City and Redevelopment Agency will be commenced. As the relocations of other existing businesses are also entirely speculative, the DEIR states that such relocations will be subject to supplemental environmental review.

In order to provide the public with complete information, responses to all of the comments raised on the economic analysis during public review of the recirculated DEIR have been provided. For convenience, responses to economic comments have been included as Attachment A to these responses. Please refer to Attachment A for a response to this comment.

Lastly, minor technical changes have been made to the FEIR. These changes do not affect the outcome of the environmental analysis of the proposed project. All technical changes as well as changes to the text resulting from responses to comments are presented in a crossout/underline

fashion. Text changes resulting from responses to comments are presented in the specific response as well as the text of the FEIR. Technical changes to the FEIR include:

- Landscape specifics associated with the sizes and species of trees to be used in the landscaping.

- Correction of minor grammatical and typographical errors.

RESPONSES

The DEIR is a neutral, unbiased analysis of the environmental impacts of the proposed Scripps project; it is not the environmental document for any other project. The DEIR has been prepared by Dudek & Associates and has undergone extensive review by City staff. The DEIR identifies certain significant effects of the proposed Scripps project, as well as the mitigation measures which are required to reduce those effects to a level of less than significant, although certain effects will remain significant (see Draft pp. 67 and 118). Public input was received on this document throughout the DEIR process, a public hearing was held on September 25, 1991, and written comments were accepted and are being responded to in this FEIR. In addition, although not required by CEQA, this FEIR is being made available for public review prior to its consideration by the Planning Commission. It is common practice to have an administrative draft reviewed by a number of parties, including the project applicant. (Although not the case here, a project applicant can actually prepare the EIR for a proposed project). City staff and their consultants used their independent judgment to review and analyze information provided by the project applicant.

Detailed responses to the MacLeod Consulting Services letter are presented in response to Comment #'s 8-29.

COMMENTS



RTM West, Inc.
625 Mexican Grade Road
San Diego, CA 92120
(619) 280-4037

September 23, 1991

Ms. Maryann Miller
PLANNING DEPARTMENT
276 Fourth Avenue
Chula Vista, CA 91910

SUBJECT: COMMENTS ON SCRIPPS HOSPITAL DEIR

Dear Maryann:

After a thorough review, I find that the DEIR is so flawed and so biased that simple clarifications and corrections are not enough as would be normal in these projects. THIS DOCUMENT SHOULD BE COMPLETELY THROWN AWAY AND STARTED AGAIN IN A LEGAL AND UNBIASED MANNER which does not simply support staff's original conclusions using Scripps information as facts to support them.

The DEIR process is supposed to be a third party neutral document pointing to significant problem areas needing mitigation measures and then outlining those measures for correction of significant impacts.

In addition, the fact that Scripps officials met privately with city staff to review and change the DEIR before it was made public is potentially damaging or destructive document to Scripps), is in my opinion completely contrary to redevelopment law. Further, the fact that the other alternatives were not given the same courtesy even when specifically asked for further shows the bias and prejudice which clouds this entire project.

In the MacLeod Consulting Services memo to you which is provided along with this letter, she outlines at least 17 different places in the DEIR where your statements are false, misleading, unsupported or biased.

1

2

RESPONSES

The EIR preparers were unaware that such a revised site plan existed until receipt of this comment. The revised site plan is attached to the MacLeod Consulting Services letter of comment and included in these responses to comments.

A comparison of the revised site plan to the H Street Business Coalition Alternative, as shown in Figure 26 of the DEIR, indicates that the only change in the revised site plan is the elimination of a median along the main H Street access to the hospital and the provision of one-way entrance only to the project site from H Street. Such one-way access is also incorporated into the proposed project design as shown in Figure 24 of the DEIR. (The proposed project limits access from H Street to one-way only since the H Street access is designated as a primary ingress for drop-off to the hospital.) The modified H Street Business Coalition site plan showing ingress only to the hospital would remove the noted conflict between vehicles turning right exiting the hospital and vehicles turning right into the Arby's driveway. However, according to the City Traffic Engineer, the close proximity of Arby's driveway to the H Street hospital access would remain a potential conflict as noted on page 138 of the DEIR.

One issue raised by the revised site plan attached to the MacLeod Consulting Services letter is the provision of access to the Chula Vista Shopping Center. Left turn access to the shopping center from H Street has been incorporated into the proposed project design as illustrated on Figure 24 of the DEIR but such access is not shown on the revised site plan prepared by the H Street Business Coalition. Provision of access to the Chula Vista Shopping Center would need to be considered should the H Street Business Coalition Alternative be selected.

3.

COMMENTS



RTM
2275 Mission Center Road
San Diego, CA 92120
(619) 785-0037

RECEIVED

SEP 23 1991

PLANNING

Page Two
Re: Maryann Miller
September 21, 1991

The worst of which is the fact that you did not include our revised site plan which mitigated traffic impacts of Scripps officials and city staff. You used our first preliminary plan instead of the revised plan you gave to the city staff. In addition, GILY SHALL CHARGE BLINDLY to a two way (in/out) Scripps entrance and in a meeting with myself and Gail MacLeod in which we specifically told you that this was wrong. (July 23, 1991) This staff went to cite traffic problems with a incorrect proposal. This appears to be an obvious attempt to discredit the "H Street Coalition" proposal and justify the staff's original pick for the Scripps proposal.

3

RESPONSES

4. As discussed in Section 4.1 of the DEIR (page 42), the City of Chula Vista has determined that the proposed project would be consistent with the Town Centre II Redevelopment Plan. The site is designated central commercial and as defined in the Redevelopment Plan, central commercial "may be used as a mix of regional-type commercial uses, including, but not limited to, retail, office, service, entertainment, educational and auxiliary uses." A redevelopment plan amendment would not be required to implement the project.
5. The comment is noted. It does not comment on the adequacy or sufficiency of the DEIR and no response is necessary.
6. As shown on Table 9 of the DEIR (page 126), the proposed expansion of the Chula Vista Shopping Center (the mall expansion) was considered in the cumulative traffic analysis for the DEIR. In addition, a separate EIR is being prepared for the mall expansion. The traffic analysis for that EIR will include the proposed hospital expansion. Item #6 of Attachment A to these responses responds to synergy of regional malls.
7. Please refer to response to Comment #1.

COMMENTS

- 4 The staff's attempt to show that the hospital's expansion is consistent with the redevelopment plan is shameful. It is common knowledge that this site was specifically put into the town center II redevelopment area to facilitate the moving of the Vons Supermarket (from Chula Vista Shopping Center) and to promote the complementary commercial uses for the newly redeveloped center in which the city put millions of tax payers' money.
- 5 To now make a complete reversal by simply stating that a "conditional use permit" allows hospital expansion on this site is wholly inadequate. The DEIR must state that the Scripps project proposal is a complete change from the original plans. The result of this change is that business centers on the site were duplicated, leaving the site open to competition in a way that would facilitate their business growth. How these same businesses face extinction through condemnation.
- 6 The Chula Vista Shopping Center is clearly shown in the DEIR to be doing poor in comparison to other centers in the county. (see attached) In fact, a plan is currently under review to add an anchor and theatres in an attempt to revitalize the center.
- 7 Anyone knowing commercial retail will know that the synergistic effect of regional malls and support commercial business around the site only helps bring traffic to both centers. The DEIR needs to study this effect clearly and conclude what negative effects the hospital traffic congestion will cause on the center. At what point will shoppers simply turn to Bonita Plaza because of the hospital traffic congestion.
- 8 By putting this parcel and its existing businesses on the site in a redevelopment area, you accepted the responsibility to live up to a fair and impartial decision on its redevelopment.
- 9 This flawed document and the biased attitudes which created it violated that public trust and must therefore be discarded and the process be completed again in a fair and impartial manner.
- 10 Respect for the law and the sense of fair-play expected from Chula Vista citizens demand no less.

Sincerely,

Charles R. Harmon

Charles R. Harmon
President
RTH West, Inc.
CRH/ad

COMMENTS

RESPONSES

8.

The comment is noted. A reference to discussions between the hospital and the Redevelopment Agency in 1988 is added to page 21 of the DEIR as follows:

MacLEOD
CONSULTING
SERVICES

September 20, 1991

Ms Maryann Miller
Planning Department
716 Chula Vista Ave
Chula Vista CA 91910

Subject: Comments on Scripps Hospital DEIR

Dear Maryann:

On behalf of the H Street Business Coalition, I submit the following comments on the subject DEIR. The comments are in the same order as the page number sequence in the DEIR.

1. p.21 Please correctly indicate that Scripps Hospital first contacted the Agency staff regarding the hospital expansion in July 1988, rather than May 1989. See Attached memo from city files (Attachment A).

"2.0 PROJECT DESCRIPTION

2.1 LOCATION

The Scripps Memorial Hospital Expansion project is located on approximately 13 acres east of I-5 in downtown Chula Vista. Fifth Avenue and H Street form the western and southern boundaries of the site and Fourth Avenue is approximately 300 feet to the east. A junior high school is located directly north of the project site. The project site is presently developed with the existing Scripps Memorial Hospital and several commercial uses. The existing commercial uses would be displaced with implementation of the proposed project. These uses include an existing gas station, Arby's Restaurant, Captain Kidd's Restaurant, Farrell's Ice Cream Parlor, Skateland, a theater, First Interstate Bank and a Readicare facility. The project site is located on page 69 of the Thomas Brothers Map Book, coordinate D-4. Figures 1 and 2 are regional and local vicinity maps illustrating the location of the proposed project.

2.2 PROJECT BACKGROUND

The project site has been developed for many years with medical facilities and a variety of commercial uses. Prior to its purchase by Scripps Memorial Hospital, the medical facility on the project site was known as Bay Medical Center. Scripps Memorial Hospital purchased Bay Medical Center in September 1986 when the medical center encountered financial difficulties. As a result of the financial difficulties, Bay Medical Center held overdue bonds with the City. When the possibility of a sale of the hospital became apparent, the City of Chula Vista, holding reversionary rights to the property, became a third party in the transaction. In order for Scripps Memorial Hospital to purchase the existing hospital, the City of Chula Vista had to be monetarily compensated for the outstanding bonds held against the hospital.

COMMENTS

RESPONSES

Discussions between the Chula Vista Redevelopment Agency and Scripps Memorial Hospital regarding a proposed hospital expansion began in 1988.

The Redevelopment Agency Agenda Statement from the May 23, 1989 meeting, herein incorporated by reference and on file with the City of Chula Vista, states that in 1989, the City of Chula Vista and the Redevelopment Agency were contacted by Scripps Memorial Hospital"

The referenced statement on page 24 of the DEIR simply summarizes information included in the May 23, 1989 Redevelopment Agency Agenda Statement which has been incorporated by reference into the DEIR and does not represent a conclusion drawn by the EIR preparers.

The discussion on page 25 of the DEIR summarizes information included in the May 23, 1989 Redevelopment Agency Agenda Statement which has been incorporated by reference into the DEIR. Supporting information regarding the Agenda Statement would need to be obtained from the Redevelopment Agency. For further discussion of employment effects, please refer to Item #4 of the response to economic questions included as Attachment A to these responses.

The referenced statement on page 43 of the DEIR occurs in the discussion of Existing Conditions in the Land Use section of the DEIR. The Existing Conditions discussion is not the appropriate place to discuss whether or not the proposed project is or is not consistent with existing land use designations and zoning. In general, findings of plan consistency are made by City Planning staff and, as noted in the discussion of Potential Impacts on page 43 of the DEIR, the City of Chula Vista has determined that the proposed project would be consistent with "existing General Plan, Zoning and Redevelopment Plan designations for the project site."

Plan consistency discussions in environmental documents are generally focused on consistency with the environmental goals of adopted plans and policies. With respect to plan consistency issues, Appendix G of the CEQA Guidelines, Significant Effects, state the following:

2. p. 24 Please clarify the statement regarding "no financial subsidy" to reflect Scripps' need for the Agency to co-sign on loan and lease agreements for the youth serving businesses. This puts the financial backing of the Agency behind Scripps with the possibility that city funds would bail out future problems.

3. p. 25 No supporting evidence is provided on the "quality of jobs created and the multiplier effect of salaries of "quality" jobs created and average salaries would be reflective of "quality" and the multiplier effect should be based on empirical data on whether hospital personnel will really spend money at nearby retail establishments.

4. p. 43 The DEIR indicated that the Central Commercial zone is to stabilize, improve and ~~eliminate~~ the commercial characteristics... yet it does not point out that the hospital expansion eliminates rather than protects commercial on the site. In fact the applicant is making retention of some commercial uses on site during phase 1 as difficult as possible.

COMMENTS

RESPONSES

A project will normally have a significant effect on the environment if it will: (a) Conflict with adopted environmental (emphasis added) plans and goals of the community where it is located.

Environmental goals of the Chula Vista Area Plan, within which the project site is located, are summarized on page 40 of the DEIR. With respect to the proposed project's relationship to the environmental goals of adopted plans, page 43 of the FEIR states: "By concentrating uses within the urban core, and providing for infill development, the project implements one of the environmental goals of the Central Chula Vista Area Plan which calls for encouragement of development in the project area which reinforces the area as a focus for the larger City-wide community." Other goals of the Central Chula Vista Area Plan related to the quality of life and vitality of Central Chula Vista are related to Urban Growth and Change and Retail Commercial development. Under these general goals, the Chula Vista Area Plan identifies the following specific objectives:

GOAL 1. URBAN GROWTH AND CHANGE

Central Chula Vista and the Urban Core in particular are likely to continue to undergo transition from lower density to higher density activities through introduction of new and redeveloped commercial and employment uses. Some changes will occur as a matter of course, as exemplified by new retail and visitor commercial uses along Broadway and E and H Streets. Other changes will occur as part of planned development and redevelopment efforts such as the Bayfront and Town Centres I and II. Through such changes, it is the goal of Chula Vista to foster the vitality and preeminence of Central Chula Vista and the Urban Core in particular as the downtown and focus of the city.

Objective 1: Maintain and support the vitality of commercial establishments along Third Avenue, in Chula Vista Shopping Center and along Broadway.

COMMENTS

RESPONSES

Objective 2: Enhance the visual quality of the urban environment of the Urban Core through actions such as improved entry locations, design coordination of Broadway shops, provision of street trees, furnishings, signage and ongoing property maintenance.

Objective 3: Within the Urban Core, encourage the development and maintenance of a low-density village character in Town Centre I; open park-like setting of the Bayfront; and high intensity uses in the area between Interstate 5 and Broadway.

GOAL 3. RETAIL COMMERCIAL

Retail commercial is an important activity in the economy of Central Chula Vista. It is the goal of the city to foster this activity in the three retail centers of Central Chula Vista: Third Avenue shops, Chula Vista Shopping Center, and Broadway.

Objective 8: In order to increase the base of shopping support, encourage multifamily housing and mixed commercial office/residential uses within selected areas in the vicinity of Third Avenue.

Objective 9: Incorporate the Third Avenue area into the larger group of urban uses located with and along the Urban Core.

Objective 10: Upgrade the quality of thoroughfare commercial on Broadway by encouraging developments on deep lots and with large setbacks, ample off-street parking, and landscaping.

Objective 11: Impose sign and design controls on all new developments and on renovations of existing developments.

As described in the DEIR and in the Socioeconomic Considerations Report included as Appendix G to the DEIR, the proposed project would introduce employment uses to the Central Chula Vista area which would be complementary to existing retail uses in Central Chula Vista, particularly the Chula Vista Shopping Center which is identified by the Chula Vista Area Plan as one of the three key retail centers of Central Chula Vista.

COMMENTS

RESPONSES

Provision of additional employment opportunities in the Central Chula Vista area is encouraged in Goal 1 Urban Growth and Change as presented above. Design features incorporated into the proposed project would implement Objectives 3 and 11 as presented above. In these respects, the proposed project would implement the environmental goals of the Chula Vista Area Plan.

The Chula Vista Area Plan also identifies a portion of the Chula Vista Greenbelt, an important open space feature of the Chula Vista General Plan, within the Central Chula Vista area. Within the Central Chula Vista area, the Chula Vista Greenbelt is planned to extend generally along the SR-54 alignment from the western boundary of Central Chula Vista to the Bayfront. The proposed project is not located within the area suggested for the Chula Vista Greenbelt and no features of the project would restrict implementation of the greenbelt plan within Central Chula Vista.

COMMENTS

RESPONSES

12.

As described in the DEIR, all existing commercial uses on the project site would be eliminated with the initial phase of hospital expansion. The existing uses which would remain on the eastern 4.7 acres of the property would be limited to existing hospital uses. As discussed in the DEIR (page 55), the proposed hospital expansion has been designed to be compatible with the architectural character of the existing facility and no significant impacts with respect to architectural dissimilarity are anticipated.

This scenario differs from the scenario presented under the H Street Business Coalition Alternative as described on page 135 of the DEIR. Under the H Street Business Coalition Alternative, Phase 1 hospital expansion would occur along with retention of some existing commercial uses on the project site. This would result in a dissimilarity in the architectural design of the various uses on the project site. As stated on page 135 of the DEIR, "Coordination with the Chula Vista Design Review Committee and the Redevelopment Agency could reduce these visual impacts [those associated with architectural dissimilarity]. If this alternative is selected, subsequent visual effects would be addressed at that time."

12
5. p. 53 The DEIR notes that "no changes are proposed in the eastern 4.7 acres of the site as part of the phase one development. This means that during Phase 1 significant architectural incompatibility occurs between the old hospital building and new buildings. This impact should be analyzed."
This is significant because on p. 135 the DEIR makes a point (and presumed problem) of the architectural dissimilarity caused by retaining the 3 businesses during Phase 1.

COMMENTS

RESPONSES

13.

6. p. 58 The DEIR speaks in the past tense regarding the DRC's concerns over the project, especially the bulk/size of the medical office building. Please correct this to accurately reflect the record.

At the last DRC meeting on the hospital expansion, they passed a motion asking for the height of the medical office building to be lowered: 3 stories for the western tower and 5 stories for the northernly tower. The current Scripps proposal at 4 stories and 6 stories respectively still does not comply with the DRC motion. See Attachment B.

The discussion of building height is misleading. The illustrations show the roof top equipment adding nearly another story in height. Please discuss the height compatibility in terms of actual height. Do not just number of stories. Note this issue was also of concern to the DRC at its last discussion on this project.

The DRC meeting referenced in Attachment B took place on December 3, 1990. At that meeting, the committee recommended that the height of the medical office building be reduced. (It should be noted that no motion was made at the December 3, 1990 meeting. The DRC cannot make a motion on a project until the Final EIR is available for review and consideration.) Since the December 3, 1990 meeting, the DRC has met numerous times to evaluate the proposed hospital expansion. Concerns have continued to be expressed by the DRC regarding the height and configuration of the proposed medical office building. At the most recent DRC meeting on September 23, 1991, computer simulations were presented by the applicant showing architectural features which have been incorporated into the project design to reduce the apparent bulk and scale of the medical office building when viewed from H Street. According to City staff, the DRC appeared satisfied with the proposed design (including the 4-story and 6-story elements of the medical office building) but continued to express concern regarding the western building elevations as viewed from Fifth Avenue. The DEIR states that the visual impacts of the bulk and height of the medical office building are significant. (pg. 67).

Building heights of the proposed project are as follows:

Phase 1 MOB - 56'-6"
Phase 1 Hospital Expansion - 59'-8"
Phase Ultimate MOB - 92'-0"
Phase Ultimate Hospital Expansion - 57'-8"
Parking Structure - 44'-8"

These building heights take into account roof top equipment. The heights shown are taken from site sections provided by the applicant and are "worst case" heights since the grade of the site varies. All rooftop equipment would be located behind architectural treatments so they would not be visible by passersby. As stated above, the DRC has seen computer simulations of the buildings and appears satisfied with the architectural treatments.

COMMENTS

RESPONSES

14.

According to City staff, the DRC has expressed concern regarding the time frame between the Phase 1 and Phase Ultimate development. This issue will be addressed in the City's staff report for the October 17, 1991 DRC meeting. As can be seen by comparing Figures 12 and 13 of the DEIR, landscaping features have been incorporated into the first phase landscape plan. Full perimeter landscaping would be provided during the first phase along with the entry features along H Street and landscaping of the surface parking areas. The only area of the site which would not be used during the Phase 1 hospital expansion is the area proposed for ultimate expansion of the hospital building. This area would be devoted to surface parking during the Phase 1 scenario and would not be available for development. The other area which would be used for surface parking during the Phase 1 scenario is the area proposed for the parking structure during Phase Ultimate. Under both scenarios, this portion of the site would be devoted to parking uses.

15.

As stated on page 71 of the DEIR, when widening of H Street in the vicinity of Fourth Avenue occurs during Phase Ultimate of the hospital development, the existing medical office building along H Street and some of the existing parking area would need to be removed. Demolition of these facilities would provide adequate room for widening of H Street and provision of landscape features consistent with other existing and proposed landscaping along H Street. Provision of additional landscaping would provide more screening of the existing apartment building than is currently provided by the existing parking lot and low barrier wall separating the parking lot from the roadway. The widening of H Street would not result in a problematic view of the apartment building because provision of additional landscaping would provide more screening of the existing apartment building than is currently provided by the existing parking lot and low barrier wall separating the parking lot from the roadway.

As noted above, with widening of H Street the existing medical office building and some of the additional parking area would be removed. This would provide adequate room to include a landscaped strip between the widened H Street and the relocated sidewalk, eliminating the "cramped" feeling experienced by the driver at the H Street/Fourth Avenue intersection.

14

7. The DEIR still does not discuss the site underutilization and consequent visual quality impacts of Scripps' Phase 1 Plan. Most of the project site during Scripps' Phase 1 is dedicated to the automobile, not to people or productive uses.

By not including any reference to this concern as voiced by Patrick Crowley the city's consultant, the DEIR gives the impression of selectively choosing city information for use in this report, with the apparent goal to favor the hospital expansion.

8. The visual quality section should analyze the impact of the widening of H Street near the corner of 4th. This is a required traffic mitigation for the ultimate phase and will result in a problematic view of the existing apartment building.

The DEIR describes the present situation as "cramped" because there is a 5 foot sidewalk immediately adjacent to an apartment wall (p. 71). When the road is widened, the lack of landscaping area and wall, cramped feeling will worsen.

15

COMMENTS

RESPONSES

16.

As discussed in the DEIR, and in the Traffic Analysis included as Appendix B to the DEIR, the proposed project would generate 4,980 ADT during Phase 1 development, less than the 7,814 ADT generated by existing uses on the project site. Congestion at the Fourth Avenue/H Street intersection is an existing condition which would not be exacerbated by the Phase 1 hospital development. The improvements recommended along H Street for the Phase 1 development including the widening of H Street west of the 4th Avenue/H Street intersection are intended to improve access to the hospital from H Street, not to reduce congestion on the roadway, nor the cramped feeling at the intersection of H Street and 4th Avenue since traffic generation from Phase 1 of the development would decrease the ADT in the area by 2,834 trips thereby potentially lessening traffic at the 4th Street/H Street intersection. Phase Ultimate would increase traffic in the area over existing ADT at which time the mitigation measure to widen H Street east of the hospital site is required. Impacts on traffic, after implementation of the mitigation measures on page 83 of the DEIR will be less than significant.

17.

According to the traffic consultant, the 1,500 trip increase is not regarded as significant since project traffic would be distributed over four streets within the City's existing street network. As shown on Table 9 (page 126 of the DEIR), projected traffic increases anticipated by currently proposed projects were incorporated into the cumulative traffic analysis for the DEIR. Buildout according to the General Plan was assumed for other land uses. Projects coming forward inconsistent with the General Plan would require plan amendments, a discretionary action subject to CEQA review. It would be appropriate to address the cumulative effects of such potential land use changes if and when such amendments are proposed.

9. pp 69-71 The intersection traffic data indicate that Scripps project causes a congestion problem at the 4th and H streets intersection. Further the "cramped" feeling (p.71) experienced by the driver near this intersection is identified as a problem, but is not mitigated during phase 1.

Solutions to the 4th and H street intersection congestion are logically found at 4th and H street. But widening H street west of 4th would require demolition of an office building owned by the applicant.

The phase 1 mitigation is therefore to widen H street in front of applicant's building on the theory that relief of downstream friction will then keep traffic moving. But this is not really a first choice solution to the traffic congestion problem at 4th and H Streets and falls into the objectivity of the DEIR.

The DEIR should discuss the appropriate mitigation (if in fact needed during phase 1) for the 4th/H Streets intersection.

10. p. 77 The project will generate 20% more traffic than allowed by the General Plan trip estimates. However, no additional mitigation measures (beyond those accounted for in the General Plan) are required.

A 20% increase in trips generated is significant. The DEIR should assume that such an increase is a privilege that could be extended to all development projects. The cumulative impact of this would significantly effect the level of service throughout the city.

COMMENTS

RESPONSES

18.

It is not anticipated that businesses would be affected by offsetting the hospital entrance driveway (Driveway B) as discussed on page 80 of the DEIR. The offset discussion on page 80 refers primarily to design of the center median on H Street in relationship to the existing entrances off H Street to the project site and the Chula Vista Shopping Center and does not refer to the actual physical movement of either driveway location at the project site on the Chula Vista Shopping Center. Left-turn pockets within the median are proposed to be offset to provide adequate left turn access to both facilities as illustrated on Figure 24 of the DEIR. The discussion on page 80 has been revised in the FEIR to clarify recommendations regarding the access to Driveway B off H Street as follows:

Access Parking and Internal Circulation

The Scripps Hospital Expansion project preliminary site plan indicates several access points to H Street, Fifth Avenue and G Street (see Figure 3). This plan has been revised to address the traffic related issues identified by the City Traffic Engineer.

As shown on Figure 24, the primary west access would be provided from H Street via Fifth Avenue. Driveway D would be patient/visitor access only to the parking structure and driveway E would be emergency room/service/staff access only to the parking structure and emergency room parking. As a worst case scenario, 70 percent of the project peak hour trips were assumed to take access from driveway D (based on the ratio of parking structure spaces to total project parking spaces). This access is projected to operate at LOS A and D during the morning and evening peak hours, respectively, for the driveway approach left turning vehicles. Additional access to the parking structure, however, is provided from driveway C and E.

Driveway A is a right in-right out only along H Street serving the emergency room/service and existing medical office building. Driveway B is an ingress only along H Street serving the hospital drop off area. # ~~may be necessary to offset this driveway to the west of the shopping center driveway on the southside to provide sufficient turning radius for~~

1) p.80 The DEIR suggests a potential need to offset the main driveway entrance to the west of the shopping center driveway. We view this as an attempt to eliminate consideration of keeping the Arby's restaurant during phase 1.

Another equally viable solution is to relocate the shopping center driveway as part of the Homart redevelopment plan. In this manner, no businesses are affected and the desired turning movement is achieved.

The EIR consultant should carefully evaluate mitigation measures suggested by either the applicant or the staff to make sure there is not a hidden motive.

18

COMMENTS

RESPONSES

~~eastbound-motorists-turning-left-into-the-hospital. The center median along H Street in the vicinity of Driveway B should be designed to accommodate left-turn access to both the project site and the Chula Vista Shopping Center as shown in Figure 24. Driveway C is a right in-right out only along H Street serving the medical office building drop off area and the parking structure. This driveway serves as the primary ingress to the parking structure from the east and west bound egress from the parking structure.~~

Driveway F is a north access from G Street serving the Emergency Room/staff and service parking. According to the hospital staff, the hospital experiences 450-600 emergency vehicle trip ends per month. This averages at approximately 15-20 trip ends per day. G Street between Broadway and Fourth Avenue is projected to operate at LOS C or better under existing plus project conditions. Additional access to the staff and"

COMMENTS

RESPONSES

19.

The hospital does not currently use access off Fourth Avenue as a main entrance. The primary entrance to the existing hospital is from H Street. As discussed on page 82 of the DEIR, provision of alternative access from Fourth Avenue "would entail a joint access agreement with the existing medical office uses on the west side of Fourth Avenue and the elimination of existing parking spaces." As discussed on page 82 of the DEIR, implementation of the Fourth Street access alternative would not improve the level of service at the H Street/Fourth Avenue intersection. As stated in the DEIR, an Intersection Capacity Utilization (ICU) analysis completed for this alternative access concluded that provision of access from Fourth Avenue would result in a slight degradation of the level of service at this intersection. This option would therefore not reduce the "cramped" feeling in the vicinity of the intersection.

The comment with respect to the cost/benefit reference is noted. This statement has been deleted from the FEIR as follows:

"service parking and emergency room would be provided from driveways A and E. Therefore, no significant traffic effect on G Street is projected with or without driveway F access.

-- Alternative Access to Fourth Avenue

An additional access directly to Fourth Avenue was discussed with the City of Chula Vista Traffic Engineer. This would allow access to four different streets and tend to spread turning movements out more evenly to and from the project. This would entail a joint access agreement with the existing medical office uses on the west side of Fourth Avenue and the elimination of existing parking spaces.

This access alternative would most likely impact the H Street/Fourth Avenue signalized intersection since it would redistribute traffic north along Fourth Avenue instead of west along H Street. An analysis for the H Street/Fourth Avenue intersection was performed under 1995 plus Phase I conditions with a project access to Fourth Avenue under AM and PM peak hour conditions. Fifty percent of traffic from the south and east was assigned to this access and resulting peak hour traffic re-routed at the

19 12. P. 82 The DEIR discusses hospital access off Fourth as an "alternative". The hospital currently uses access off Fourth as a main entrance. Presumably, all necessary agreements exist to allow such access.

The DEIR states that access off Fourth redistributes traffic north along Fourth instead of west along H street. This would be advantageous given the concern over the cramped feeling and side friction along H street.

The DEIR concludes access off Fourth wouldn't be advantageous from a cost benefit standpoint. Whose cost? Whose benefit? And what does cost benefit have to do with environmental analysis? Since Scripps already has access off and signage on Fourth, what are the costs?

RESPONSES

above mentioned intersection. The ICU analysis indicated a slight degradation from 0.56 to 0.57 during the AM peak hour and 0.86 to 0.88 during the PM peak hour. ~~Since the level of service does not improve, the additional access at Fourth Avenue may not prove to be advantageous from a cost-benefit standpoint.~~

Construction Traffic

Although grading would be ~~less~~ and balance on-site with Phase 1 of the project, grading associated with the basements and parking structure in Phase Ultimate would require exporting of soil from the site. Temporary construction traffic may be generated from the site as exporting occurs from the site. In the absence of control measures, temporary traffic congestion could occur in the surrounding area."

Please refer to the responses to Comment #'s 16 and 17.

As described on pages 87 and 88 of the DEIR, a noise analysis was completed to evaluate potential noise effects of automobile traffic within the parking garage on the adjacent junior high school. It was assumed that cars within the parking garage would travel at a rate of 6 mph. The 6 mph estimate does not refer to cars travelling on public streets.

As stated on page 89 of the DEIR, the standby (emergency) power equipment will be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The DEIR states that "the planned enclosure for the standby power unit will provide the necessary noise reduction." This requirement is also included in the mitigation monitoring program on page 155 of the DEIR. The noise mitigation requirement has been added to the mitigation monitoring table (Table 16) in the FEIR. A new mitigation monitoring table is included in this FEIR.

COMMENTS

20. P. 83 & 84 The traffic impact conclusion should be significant and not mitigable for phase 1 since the ramped driver problem on H street is not solved. Further the ultimate plan generation of 20% more traffic than allowed by the General Plan is not mitigated.

21. P. 88 Explain why a noise analysis assumed that cars are only travelling at 6 mph?

22. P. 89 The emergency power source generates 76 dB(A) at the property line. This is significant. How will it be mitigated, especially with the proximity of the school.

COMMENTS

RESPONSES

23.

Since the HVAC and standby power equipment would be enclosed or otherwise designed to ensure compliance with State standards, no cumulative noise would be generated by these combined facilities which could result in adverse impacts. Likewise, as discussed on pages 88 and 89 of the DEIR, emergency vehicle noise is expected to be intermittent and infrequent. One emergency vehicle trip per day is expected to use a siren and the siren would be turned off as the emergency vehicle enters the hospital site. The intermittent, single event noise associated with emergency vehicle use would not exceed the hourly noise standard for the project area.

A worst case scenario, assuming the three noise sources are in close proximity to each other and the noise recipient is at a distance from each noise source where maximum noise levels from each noise source are heard, noise levels would rise approximately 4.7 dB. Since this situation is highly unlikely to occur due to the non-stationary position of one of the noise sources (the emergency vehicles) and the intermittent and infrequent nature of all three of the sources, it is not considered significant.

24.

As noted in response to Comment #17, the 1,500 trips over General Plan assumptions associated with the proposed project is not regarded as significant nor are these trips expected to contribute to congestion in the project area. As noted in Attachment A to these responses, Scripps Memorial Hospital is regarded as a community hospital not as a membership based hospital facility such as the Kaiser facility proposed east of I-805. The service area for the Scripps Hospital is generally regarded as the Chula Vista community. The statement regarding infill development may therefore be regarded as correct.

23. P. 88 L. 69 What is the cumulative impact of noise if the HVAC, Standby power, and emergency vehicles are simultaneous?

24. P. 101 has the following statement in regard to air quality:

"Due to the relatively low number of trips, the absence of congestion, and the fact that the project represents infill development with concomitantly fewer trips than would occur if the project were developed in a more outlying area, this contribution is not regarded as significant."

The reasons given for non-significance are unsupported. First, this project is causing congestion, specifically 20x more than assumed in the General Plan trip estimates. Secondly, the please reasoning doesn't work for a regional serving facility, refer to page #72 below which asks for the data on vehicle miles traveled, and hospital market area.

Due to the congestion and the absence of "concomitantly" fewer trips, please reanalyze the air quality impacts and mitigation measures.

COMMENTS

RESPONSES

25.

As described on page 116 of the DEIR, the water demand analysis is based on existing use by the hospital as evidenced by meter readings for the period April 8 through June 3 1991. Using existing water demand to project future water demand is considered to be an appropriate methodology for the water demand analysis included in the DEIR. As described in the DEIR (page 117), low water use features have been incorporated into the proposed landscape materials and irrigation plans. Landscaping associated with the proposed hospital expansion is not expected to require significant volumes of water. Additional information on specific water uses for the site has been calculated by the engineers for the project. According to the project engineers, approximately 49,300 gpd will be used for the hospital site in Phase I. Phase Ultimate water usage would be approximately 61,400 gpd. The water demand analysis in the DEIR assumed a total water usage of 70,780 gpd (24,500 gpd on existing hospital site + 46,280 gpd for the expansion), which is greater than the project specific total of 61,400 gpd as calculated by the project engineers.

26.

The comment is noted. The referenced statement has been deleted from the FEIR. Page 132 now reads as follows:

"... Noise

Potential noise impacts associated with the proposed project would be the same under this alternative as under the proposed project with the exception that noise generated by emergency vehicles along G Street would be avoided under this alternative. Due to the intermittent nature of emergency vehicle traffic on G Street, significant noise impacts were not identified for the project's proposal to provide emergency access from G Street.

6.3 H STREET BUSINESS COALITION ALTERNATIVE

This alternative is regarded as a phasing option. Under this alternative, the Arby's Restaurant, First Interstate Bank and the Readicare Center that are currently located on-site would remain with the first phase of the

10. P. 116 The water use data may be wrong. The methodology is flawed. The projection for future use should not be based on a gpd/net acre of existing hospital use.

The new hospital site will have significantly more landscaping and the ratio of land to building as well as type of building use will change significantly. This will substantially change the gpd/net acre.

Please revise these projections based on actual site usage, accounting for landscaping, medical office building, and hospital uses.

19. P. 132 Including the biases of the applicant regarding the "efficiency" of the H Street Business Coalition proposal further taints the DEIR's objectivity. Such a comment does not belong in the DEIR.

25

26

COMMENTS

RESPONSES

hospital expansion (see Figure 26). The hospital expansion plans would be identical to the proposed project in terms of the additional square footage and facilities to be provided. The configuration of the facilities, particularly the proposed medical office building, would, however, differ from the proposed design. In addition, the entry along H Street would need to be redesigned under this alternative to accommodate retention of Arby's. ~~According to the applicant, the overall design under this alternative would not be as efficient as under the proposed project.~~ This proposal is consistent with the General Plan by retaining commercial uses on-site.

If the H Street Business Coalition site plan (Figure 26) is compared to the Phase I site plan for the proposed project (Figure 3), a number of differences are apparent in the layout of the 8.9-acre expansion area. As shown in Figure 26, the H Street Business Coalition Alternative, a 5-story medical office building is proposed paralleling H Street just north of the Readicare Center and the First Interstate Bank. Phase I of the proposed project (Figure 3) shows a 4-story medical office building located adjacent to 5th Avenue. The location of this 4-story medical office building is important in reducing visual impacts of the project, and arose from prior design review concerns associated with building mass impacts on the existing street scene. At one time, the project proposed a 5-story medical office building with Phase I construction with

COMMENTS

RESPONSES

27.

Please refer to response to Comment #3.

28.

Please refer to response to Comment #16. Widening of H Street is not required until Phase Ultimate of the proposed hospital expansion because under the Phase 1 scenario fewer trips would be generated from the project site than occur under existing conditions and the proposed project would not directly worsen the situation in this area. However, the request of the City Traffic Engineer for a westbound auxiliary lane with the H Street/Business Coalition Alternative is due to a direct potential safety hazard that is created with this alternative, specifically, the retention of the H Street Business Coalition driveway in close proximity to the hospital driveway on H Street.

The referenced accident data is noted. In the opinion of the City Traffic Engineer, the retention of the H Street Business Coalition driveway and the narrowness of the westbound curb lane would represent a potential safety risk. It is noted that this safety risk does not appear to be reflected in the available accident data.

27. P. 138 The H Street Business Coalition Alternative was revised to show the one way entrance. Staff indicated this would be used in the DEIR.

28. P. 138 In reference to the H Street Business Coalition of the Alternative for Phase 1, the DEIR identifies the narrowness of the westbound curb lane on H Street as a potential safety risk and the traffic safety can be enhanced by widening H Street.

The fact that a narrow west bound lane is a potential safety hazard enhanced through widening is also relevant to the cramped lane situation described for the portion of H Street near Fourth Avenue (see "cramped" discussion on p. 71). Yet, widening is a Phase 2 requirement for the Scripps project presumably because they'd have to tear down a medical office building.

We ask for the same accommodating attitude shown toward the Scripps proposal. Further the safety problem is not evidenced by traffic accident data.

Fortunately the businesses exist today, so conjecture is not needed on the impacts. Attachment C is a traffic accident analysis conducted by the Chius Vista engineering department. It shows 1,822 collisions as compared to the Caltrans "expected accident rate" of 4.5 for an undivided road. The expected rate for the ultimate 6 lane H street is also 4.5.

Please address the road widening issue consistently along the entire length of H Street and rely on actual data to indicate accident/safety considerations.

COMMENTS

RESPONSES

29. Please refer to the responses to questions on the economic analysis included as Item #1 of Attachment A to these responses.

29 22. p. 151 The DEIR states that a hospital complex east of I-805 would likely serve a different market area than does the existing hospital in central Chula Vista. Data are needed to support this statement. The DEIR implies the applicant is the source of this information.

At public meetings the applicant has stated that the hospital serves all of South Bay and Tijuana. This contradicts the perception of a hospital dominated by a localized market in central Chula Vista.

For this section and the air quality section, specific documentation is needed on Scripps Hospital's current patient origins, vehicle miles traveled given the proposed and alternate location options, as well as locational information of where the new patients will originate.

With such locational information and vehicle miles traveled, the optimal location for serving the hospital's regional marketplace and the air quality implications can be reasonably assessed.

Thank you for considering our comments.

Sincerely,

Carl Haclaed

COMMENTS

RESPONSES




 Scripps Memorial Hospital

 3500 La Jolla Village Drive

 San Diego, CA 92161-1600

 (619) 447-7200

MEMORANDUM

RECEIVED

Date: July 21, 1988

 To: Paul Destrochers

 Community Development Director

 Community Development Dept.

From: Jeff K. Bills

 Re: Site Plan



Paul:

 Attached, please find a site plan showing the extension of facilities to the west of the current hospital site.

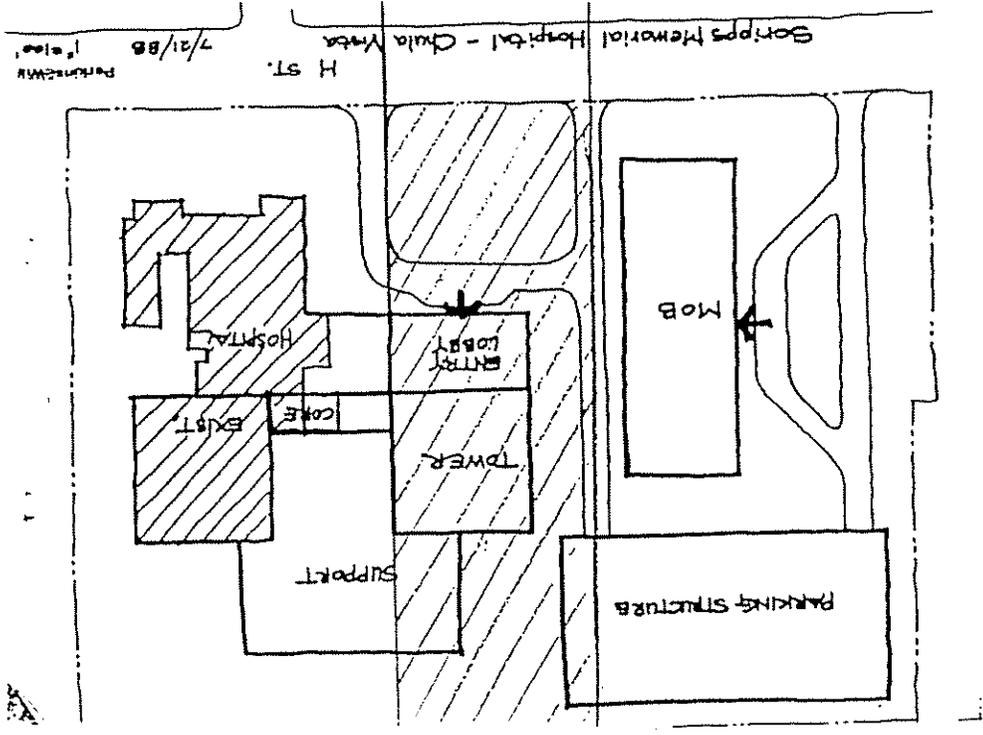
 As I mentioned, this is our first pass and reflects a signing of those items essential to the expansion, growth and development of Scripps Memorial Hospital - Chula Vista.

 Additionally, the size of buildings and circulation shows will no doubt change as we refine the plan.

 If there are any questions, please call.

RESPONSES

COMMENTS



RESPONSES

COMMENTS

December 3, 1990

DEC. 1990

structures. Consequently the office building is being presented in a combination of five and four stories. In regard to the building combination of five and four stories, the structure was located setbacks. Mr. Larry explained that the structure was located approximately 25 feet from Fifth Avenue property line and approximately 40 feet from H Street. Project Architect Childs explained in detail the office building design and different design components. He explained that, as a result of staff concerns, the revised design featuring a water feature was being created at the corner of H and Fifth Avenue. After hearing the project architect's description of the building design, the committee recommended to reduce the westerly building height to three stories and the other building to four stories. The committee reaccounted their recommendation as follows:

1. Mechanical equipment enclosure located on top of the hospital building structure could be reduced in height, producing two arch elements to visually reduce the enclosure height.
2. Equipment structures should be modified to provide more substance and meaning.
3. A driveway shall be provided along Fifth Avenue for the parking lot on Phase I.
4. A recommendation from the city's traffic engineer shall be forwarded to the Design Review Committee, addressing the potential hazard created by the intersection of the service driveway at Fifth Avenue and school kids crossing said driveway.
5. Office building towers shall be limited to three stories for the westerly tower and five stories for the northerly tower.
6. Lower floor shall be articulated to reduce building height.
7. The brick color shown in the building elevation, should be brick and the white element smooth finish a stucco.

ADJOURNMENT

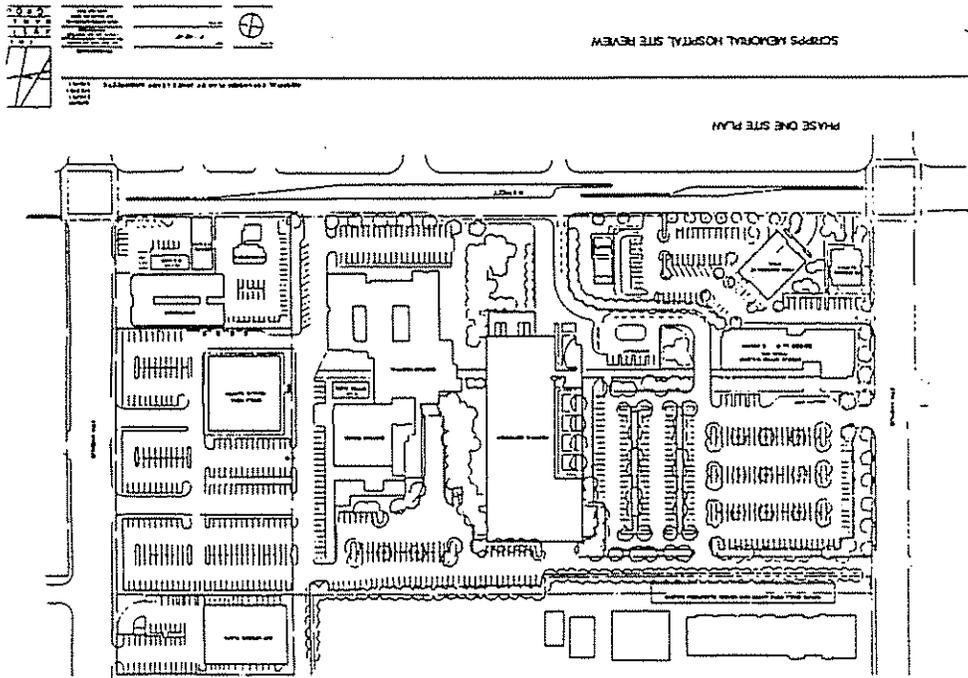
Meeting was adjourned to the December 17, 1990 regular meeting in Conference Room 2 and 3 of Public Services Building located at 215 Fourth Avenue, Chula Vista.

Recorder
J. Luis Hernandez

MPC 0792P

RESPONSES

COMMENTS



COMMENTS

RESPONSES

- 30.** As discussed in the Introduction to this FEIR, there are no physical changes associated with economic or social impacts. Therefore, this comment is noted in the FEIR. Please also refer to response to Comment #9 and the responses to questions on the economic analysis included as Item #2 of Attachment A to these responses.

A. D. HINSHAW ASSOCIATES
6136 Mission Gorge Road • Suite 111 • San Diego, CA 92120-3413
619/280-2264

September 27, 1991

Environmental Review Coordinator
City of Chula Vista Planning Department
P.O. Box 1087
Chula Vista, CA 91912

Re: Comments on EIR 90-07
Scripps Memorial Expansion

Attn: Ms. Maryann Miller

Dear Ms. Miller:

This letter is submitted on behalf of Circinus Corporation, Wayne Hencke, President, one of the owners of the master ground lease covering the property upon which the above-referenced redevelopment project is planned. The following comments in the Draft EIR are submitted in response to the public review period as noted in the Notice of Completion.

30 **PAGE 74 (ixxi):** The EIR concludes that, "the anticipated taxable value of the medical office building and parking garage, and the fact that the Scripps proposal required no financial subsidy as would be required by some of the commercial proponents, the hospital project compared favorably in terms of financial returns to the Agency".

The EIR does not contain any information or data that supports a conclusion that the taxable value of a medical facility would exceed a commercial facility. Rather, the Socioeconomic Considerations study (Appendix G) concludes that the Retail and Entertainment Alternative (with 60% new sales) would produce \$2,833,700.00 of discounted revenues, \$91,500.00 more than would the proposed hospital expansion. With 30% new sales, the alternative would produce \$2,124,500.00 of revenue, which is essentially the same as the hospital expansion. Given this information, there is no basis for the conclusion stated.

Further, there is no evidence that the Scripps facility compares favorably with respect to commercial facilities in terms of a financial subsidy. In fact, as stated in the Socioeconomic Considerations report (App. G, pg. 9), a subsidy that may be required for the Retail and Entertainment Alternative is, if a community facility (such as a roller skating rink) is included.

1

COMMENTS

Page 25 (last 3): The Redevelopment Agency has concluded, "... that the quality of jobs created and the multiplier effect of salaries and cost of operation would be greater with hospital expansion than with commercial development (City of Chula Vista, 1989). The cited document is not summarized in the EIR so that the reader cannot determine if, in fact, there is any validity to the conclusion cited. The fiscal analysis that is contained in the EIR doesn't address the quality of jobs, multiplier effect or cost of operation. Consequently, the EIR does not contain information upon which the public can decide whether or not the Agency's decision making process has led to a reasonable conclusion.

Page 27 (2nd 3): This paragraph refers to 12 objectives of the Town Center II Redevelopment Plan. These objectives include the:

- Elimination of blighting influences, including incompatible land uses, obsolete structures; and
- Elimination of environmental, economic, social, platting and physical deficiencies.

There is no demonstration in the EIR that the existing land uses on the site are blighting influences, incompatible land uses, obsolete or constitute an environmental, economic, social, platting or physical deficiency. Thus, there is no rationale for removing the existing uses. First Interstate Bank, Redicare Center and others all wish to remain on the existing site and have proposed an alternative to the proposed project that would allow them to remain.

We disagree with designation the project site as a blighted area. The California Redevelopment Law defines "blighted" as:

Conditions . . . causing a reduction of, or lack of, proper utilization of the area to such an extent that it constitutes a serious physical, social or economic burden on the community which cannot reasonably be expected to be reversed or alleviated by private enterprise acting alone.

The existing commercial uses do not "constitute a serious physical, social or economic burden on the community". Neither the 1986 Redevelopment Plan nor the EIR demonstrate that the existing facilities are physical, social or economic burden on the community. Quite to the contrary, the businesses currently operating on the site produce more than adequate tax revenues to cover City costs of providing services to the site. Furthermore, there are no documented physical or social problems associated with the existing businesses.

RESPONSES

31. Please refer to response to Comment #10 for a discussion of the source of the information on page 25 of the DEIR. Please refer to the introduction to this FEIR regarding economic comments on the DEIR. Please refer also to Item #4 of the responses to questions on the economic analysis included as Attachment A to these responses.

32. The comment is noted. The discussion on page 27 of the DEIR simply summarizes information already included in the adopted Town Center II Redevelopment Plan which was subject to separate environmental review. Evaluations regarding any blighting influences or obsolete structures on the project site were made at the time the Town Center II Redevelopment Plan was adopted. The Town Center II Redevelopment Plan and accompanying EIR (City of Chula Vista EIR 88-3, SCH 88033016, May 1988) should be referenced for a discussion of the character of the existing land uses on the project site with respect to "blight" as defined by California Redevelopment Law.

COMMENTS

RESPONSES

33. Two other objectives of the Plan are to:
- Strengthen the mercantile posture of Town Center II; and
 - Retention and expansion of viable land uses, commercial enterprises and public facilities within the area.
- Removing the existing commercial uses on the project site and replacing them with hospital and medical offices is contrary to these two stated objectives.
34. Mr. Marshall E. Baskin, Senior Vice President of T 4 S Management, Inc. has reviewed the suitability of the project site for retail oriented land uses, as opposed to its development as an expansion of the Scripps Memorial Hospital. His conclusion is that the hospital expansion is not synergistic, or complementary to the Mall and does not reflect the highest and best approach to land use and land planning (pg. 2, Attachment A). A properly developed shopping center located on the fringes of the Chula Vista Mall could be expected to produce a per square foot retail sales productivity that would exceed the Chula Vista Mall.
- Enhancing and improving the existing retail character of the project site are feasible and would implement the above stated objectives of the Town Center II Redevelopment Plan.
35. The applicant's five objectives for the project (pgs. 28, 29) relate to an expanded hospital operation. None of the applicant's objectives relate to the Agency's objectives. Any redevelopment activity that occurs on the project site should be directly related to the Agency's objectives.
33. Please refer to response to Comment #4. The City of Chula Vista has determined that the proposed project would be consistent with the goals and objectives of the Town Center II Redevelopment Plan.
34. The comment is noted. It does not reflect on the sufficiency or adequacy of the DEIR and no response is necessary. Please refer to the responses to questions on the economic analysis included as Item #6 of Attachment A to these responses.
35. A discussion of the consistency of the proposed project with the relevant goals and objectives of the City's adopted plans is provided in Section 4.1, Land Use, of the DEIR. Please also refer to response to Comment #'s 33 and 4.
- With respect to the specific goals and objectives of the Town Center II Redevelopment Plan presented on pages 27 and 28 of the DEIR, the City has determined that the proposed project would implement the following goals and objectives of the adopted Redevelopment Plan as paraphrased below (the complete text of the paraphrased goals and objectives is presented on pages 27 and 28 of the DEIR):
- Elimination of obsolete structures, inadequate parking facilities, inadequate landscaping.
 - Elimination of physical deficiencies.
 - Renewal of Town Center II's physical plant.
 - Retention of public facilities within the area (in this case quasi-public, institutional facilities such as the existing hospital).
 - Comprehensive beautification of the area.
 - Establishment of design standards to assure desirable site design.

RESPONSES

Please refer to the table reproduced below which clarifies the discrepancies between the project description as presented on page 29 of the DEIR and the uses shown on Table 3 of the traffic report. As shown on the attached table, the trip generation anticipated for the project is identical to that anticipated on Table 3 of the traffic report. The attached table simply states in other words the conclusions drawn in Table 3 of the traffic report. The traffic analysis is not considered by the City Traffic Engineer to be flawed and does not need to be recirculated. As shown on the attached table, Phase I of the hospital expansion includes the addition of 116 beds (17 of which are included in the existing bed count but would be eliminated with the initial phases of expansion) and the first wing of the medical office building (60,000 square feet). Phase Ultimate includes the square footage of the diagnostic care (84,560 square feet) and administrative offices (58,800 square feet) as described in the Project Characteristics section of the DEIR pg. 29). The traffic generation rate (20 these uses are included in the bed count traffic generation rate (20 trips/bed). The 37,000 square feet of office and the 37,000 square feet of storage space that are included in the traffic analysis in Phase Ultimate has been added to page 32, the Project Characteristics section of the FEIR to eliminate confusion. This 74,000 square feet of space is the existing hospital space that will no longer be used for bed space in Phase Ultimate of the project. The traffic analysis accounted for all of the square footage described in the project characteristics portion of the DEIR. Page 32 of the FEIR now reads as follows:

"hospital administration office consisting of 58,800 square feet, would be located where the existing single story hospital building of 24,140 square feet is currently located and a two-story plus basement diagnostic and treatment center consisting of 84,560 square feet would be located north of and attached to the existing four-story hospital tower and the proposed Phase I expansion. The 74,000 square foot existing hospital tower would be converted to approximately 37,000 square feet of office space and 37,000 square feet of storage space"

Prior to the implementation of the ultimate phase, the medical office building located in the southwest portion of the site would be expanded with the addition of a six-story "wing" consisting of approximately 62,240

COMMENTS

36.

Page 29 (2nd & 3rd pt): The characteristics of the project as stated in these paragraphs include:

Existing Hospital	22,224 sq. ft.	
	73,994 sq. ft.	Total
Phase I Expansion	120,560 sq. ft.	
Hospital Expansion (99 beds)	62,180 sq. ft.	
Medical Office Building Expansion*	52,240 sq. ft.	
Medical Office Building	24,980 sq. ft.	Total
Ultimate Phase	132,570 sq. ft.	
Hospital Expansion (no new beds)	58,800 sq. ft.	
Administration Building (hospital space removed)	-24,140 sq. ft.	
Diagnostic Center	84,560 sq. ft.	Total
	251,790 sq. ft.	
	570,764 sq. ft.	TOTAL

* EIR Table 1 has in Ultimate Phase.

There is a discrepancy between the proposed project listed in this section of the EIR and the project description used to calculate traffic generation data in the traffic report (see Appendix A, Table 3) - includes only the uses to be constructed on the 8.9-acre expansion parcel. The difference in square-footage between existing and proposed land uses on the current hospital site are not included. Thus, the public does not know if the traffic generated on the current hospital site will decrease, increase or remain the same.

Table 3 also includes 37,000 sq. ft. of office space and 37,000 sq. ft. of storage space not identified in the project description. Finally, the traffic generation data does not account for the 132,570 sq. ft. expansion of hospital space with no new beds. This expansion undoubtedly will generate traffic that is not accounted for in the traffic analysis.

Given these discrepancies, the traffic analysis is seriously flawed. We request that these discrepancies be corrected and a new traffic report be circulated for public review prior to the preparation of the final EIR.

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COMMENTS

RESPONSES

square feet. A five level (one level below grade, one level at grade and three levels above grade) parking structure would be located in the northwest portion of the site where the additional surface parking was added in Phase I of the project. This parking structure would provide 775 parking spaces in addition to the 103 surface parking spaces on-site for a total of 878 parking spaces within the project boundary. All of the facilities on-site including the parking structure would feed in to a common pedestrian corridor that runs in an east/west direction through the site. This corridor would provide a pedestrian "spine" linking the main hospital facility with the medical office building and parking area to the west. Table 1 is a building area summary for Phase 1 and Phase Ultimate of the project.

**TABLE 1
SCRIPPS MEMORIAL HOSPITAL
BUILDING AREA SUMMARY**

Land Uses	Existing	Phase 1	Phase		Total
			Ultimate		
Hospital	73,994	120,560	251,790		446,344
Medical Ofc. Bldg.	--	62,180	62,240		124,420
Parking Structure	--	--	<u>263,380</u>		<u>263,380</u>
Total	73,994	182,740	<u>577,410</u>		<u>834,144</u>

COMMENTS

RESPONSES

37.

As discussed in the DEIR, the Redevelopment Agency has requested that the applicant search for relocation sites for specific uses on the project site. Relocation sites for the remaining uses on the project site would be determined following execution of an Owner Participation Agreement between the Redevelopment Agency and the project applicant. The current status of relocation activities is as follows:

-- The on-site cinema is proposed to be relocated to the expanded Chula Vista Shopping Center; an EIR is currently being prepared for the shopping center expansion (EIR 91-04, SCH #91051042).

-- Scripps has purchased Farrell's interest.

-- The roller rink is currently in escrow on a new site in the City of Chula Vista. No application for a conditional use permit or other entitlements for a new roller rink have been submitted to the City at this time.

The cumulative environmental impacts associated with the expanded Chula Vista Shopping Center (which includes the proposed theater) were analyzed in this recirculated DEIR. With regard to the roller rink, the owner of the rink is currently in escrow for new property to relocate the existing rink. However, an application for development of the roller rink has not been submitted and any analysis of impacts associated with the roller rink would be purely speculative. Once an application has been received and the full extent of the project known, environmental review in compliance with CEQA and its implementing Guidelines and the Guidelines of the City and Redevelopment Agency will be commenced. As the relocations of other existing businesses are also entirely speculative, the DEIR states that such relocations will be subject to supplemental environmental review.

38.

It is not anticipated that displacement of the ReadCare center from the project area would represent a significant impact with respect to public health and safety. The onsite hospital would continue to provide emergency service in the project area.

Page 33 (2nd 31): The EIR states that the existing commercial uses on the project site would be relocated with implementation of the project. On Page 44 (2nd 31), the EIR notes that supplemental environmental review of the relocated businesses will be required after an Owner Participation Agreement has been executed between the Agency and Scripps Hospital.

Section 15151 of the State CEQA Guidelines requires that an EIR contain a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that which takes account of environmental consequences. The current EIR defers all consideration of relocation to a later time. While an exhaustive discussion may not be possible at this stage of planning, the EIR should certainly contain a discussion of the potential impacts that may occur and an appropriate range of possible mitigation measures.

A specific example is the displacement of Readicare Center, an existing emergency dedicated health care provider. The EIR should examine the effects of displacing this use from the area. If an analysis is not possible at this time, the EIR should conclude that the potential impacts resulting from relocation are "significant and not mitigated".

37

38

RESPONSES

39. Potential impacts to existing businesses on the project site resulting from implementation of the proposed project would be economic. As discussed in the Introduction, economic impacts are not considered to be an environmental issue under CEQA because no physical changes to the environment associated with economic impacts are involved. Minimal social effects are anticipated with project implementation due to the small number of employees that would be displaced from the site and the employment opportunities associated with the project.

40. Expansion of the Chula Vista Shopping Center was assumed in the cumulative traffic analysis for the proposed hospital expansion. As shown on Table 9 (page 126 of the DEIR), the mall expansion was included on the cumulative projects list. In addition, as noted in response to Comment #6, a separate EIR is currently being prepared for the shopping center expansion. This EIR considers the impacts of the proposed hospital expansion in relation to the proposed expansion of the shopping center.

41. The DEIR neither states nor infers that continuation of existing retail uses would not be complementary to the Chula Vista Shopping Center. The discussion of the Retail and Entertainment Alternative on page 143 of the DEIR states that the uses proposed by the alternative "are consistent with both the Chula Vista General Plan and the Town Centre II Redevelopment Plan goals and objectives." For further discussion of complimentary land uses, please refer to Item #6 of the responses to economic questions included as Attachment A.

COMMENTS

39. The impacts that need to be addressed are the impacts to the existing businesses on the project site. The EIR discussion on pg. 45 (2nd ¶) does not address this issue; that discussion refers to overall commercial activity in the area, not the specific impacts that need to be addressed.

40. Page 39 (1st ¶): The last sentence of this paragraph notes that the Chula Vista Shopping Center is proposing an additional expansion including a movie theater. The discussion of short-term traffic impacts (pg. 16, Appendix A) and the street segment analysis at buildout (pg. 16, Appendix A) does not specify if the additional traffic generated by the expansion has been incorporated into the analyses. If the additional traffic that would be generated by the shopping center expansion is not included, then the cumulative traffic counts would be underestimated.

The Final EIR needs to clarify whether or not the additional shopping center trips were included in the cumulative traffic analysis. If not, then the traffic analysis should be revised and recirculated for public review.

41. Page 42 (2nd ¶): In quoting the Redevelopment Plan the EIR states that the Agency, "... desires to use redevelopment tools to facilitate redevelopment of the (project) site with complimentary uses (complimentary to the redeveloped Chula Vista Shopping Center on H Street) to enhance the economic viability of the area". Not stated, but inferred, in the EIR is that the hospital expansion would be a "complimentary" use whereas a continuation of the existing retail uses would not be complimentary to the Chula Vista Shopping Center.

COMMENTS

RESPONSES

42.

The reference on page 43 of the DEIR was to one of the goals of the Central Chula Vista Area Plan which calls for development in the Central Chula Vista Area which reinforces the area as a focus for the larger city wide community. The discussion has been clarified on page 43 of the FEIR and now states:

"western 8.9 acres. The purpose of the Administrative and Professional Office zone is to provide appropriate locations where professional and administrative office uses may be established, maintained and protected. The regulations of this zone are designed to promote a quiet and dignified environment for business administration, professional and government activities, free from the congestion and traffic of the usual retail business district. The purpose of the Central Commercial zone is to stabilize, improve and protect the commercial characteristics of the major community business centers. The C-C-D zone designation is intended to be applied in the general location of such centers as designated in the Chula Vista General Plan. Health oriented uses such as hospital facilities are allowed within the existing zones with an approved Conditional Use Permit.

4.1.2 Potential Impacts

Relationship to Adopted Plans

Implementation of the Scripps Memorial Hospital Expansion would expand the existing hospital from its current 73,994 square feet situated on 4.7 acres of land to its ultimate size of 446,344 square feet on 13.6 acres. A medical office building (62,180 square feet with Phase I and 124,500 at phase ultimate) and parking structure are also proposed for the site. The proposed hospital expansion would be consistent with existing General Plan, Zoning and Redevelopment Plan designations for the project site. The uses proposed by the project are consistent with the existing land use designations if regulated by a conditional use permit. As described in Section 2.0, Project Description, a master conditional use permit is proposed for the project. By concentrating uses within the urban core, and providing for infill development, the project also implements one of the environmental goals of the Land-Use Element of the General Plan - Central Chula Vista Area Plan which calls for encouragement of development in the project area which reinforces the area as a focus for the larger city-wide community.

Page 41 (2nd 3): The last sentence of this paragraph states that, "... the project also implements one of the environmental goals of the Land Use Element of the General Plan" (Also see pg. 3, 4th). The goal referred is not identified in the EIR. Thus, the public has no way of knowing what goal is implemented, and how the implementation would occur.

One of the basic purposes of CEQA is to,

inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities (State CEQA Guidelines, Section 15002).

42

RESPONSES

Business Relocations

Implementation of the Scripps Memorial Hospital expansion project would involve the displacement of existing commercial uses located on the western 8.9 acres of the project site. Potential impacts associated with such displacement include direct impacts to"

Pages 40-42 of the DEIR clearly describe the goals and objectives of relevant City plans and policies with respect to development of the project site. The discussion on page 43 of the DEIR describes the relationship of the proposed project to those goals and objectives. These discussions adequately respond to the commitment to address these issues in the DEIR as expressed in the Notice of Preparation (NOP). Please refer also to response to Comment #11.

At the time the Initial Study was prepared, the possibility existed that residential uses in the vicinity of the Fourth Avenue/H Street intersection would need to be removed to implement the proposed project. The project design analyzed in the DEIR does not require the removal of residential uses. No existing residential uses would be eliminated with implementation of the proposed project.

The proposed project represents the expansion of an existing hospital use in an existing developed commercial area. No features of the proposed project would increase light or glare beyond that which already exists in the project area. For example, outdoor lighting that will be included in the proposed project will be low pressure sodium lighting with glare shielding. No significant impacts associated with light or glare are anticipated.

COMMENTS

The Notice of Preparation (see Appendix A, page 2) states that, "The Land Use section (of the EIR) will describe the fulfillment of the project to the environmental goals of relevant city plans and policies." The public had every expectation that the resulting EIR would list the environmental goals of the city and a discussion of how the proposed hospital expansion plan conforms to those goals.

The statement on page 43 of the EIR is not an adequate fulfillment of the environmental goals description anticipated by the Notice of Preparation. The decision-makers and the public are left uninformed about whether or not the project (i.e., the hospital expansion) conforms to the environmental goals of the city. This inadequacy of the EIR needs to be corrected before the Final EIR is certified as an adequate document (State CEQA Guidelines, Section 15090).

Pages 42-43: These pages contain a discussion of land use impacts. There is no discussion of residential uses to be removed from the project site or area. However, the Initial Study (Item 14a) in Appendix A notes that the project will result in the displacement of residential uses. The Notice of Preparation does not mention an analysis and the EIR does not identify any residences to be displaced. Since the City initially determined that housing would be displaced, the effects of the displacement should be addressed in the EIR.

PAGE 53 (Anticipated On-Site Visual Changes)

The Initial Study (Item 13a) asks if the project could result in a new light source or glare. It is checked as "Haybe". The Notice of Preparation does not list light or glare as an issue to be addressed. Apparently, the City has determined that there will not be a significant effect, but there is no documentation in the EIR concerning such a conclusion. Since the potential for a light and glare effect has been identified in the Initial Study, the EIR should contain analytic information that demonstrates whether or not the potential exists. If there is, in fact, a potentially significant effect then appropriate mitigation measures should be identified.

43.

44.

45.

43

44

45

COMMENTS

RESPONSES

46.

Page 68 (Traffic and Parking): The traffic analysis has several deficiencies which need to be corrected. Monroy-Lopez Engineering and ENTRANCO + Federhart Engineering have prepared comment letters that focus on the traffic analysis presented in the EIR. The following three comments do concern traffic matters related to a sound wall, inclusion of the Midbayfront project and traffic related to the export of excavated materials. These three comments should be responded to along with the comments submitted by the traffic engineers.

46

Page 71 (2nd 4): The EIR traffic analysis indicates that a sound wall associated with a residential building would have to be relocated. However, there is no analysis in the EIR indicating that the relocation is possible, or what impacts may be associated with the relocation.

47

Under CEQA, a project is defined as, "the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately". Thus the relocation of the sound wall must be considered as part of the "project" and the consequences of the relocation addressed in the EIR. Of particular importance is an analysis of the effectiveness of the relocated wall to reduce sound levels to the appropriate standards.

Please refer to response to Comment #'s 83-94 for detailed responses to the Monroy-Lopez Engineering and ENTRANCO*Federhart letters. Responses to comments regarding the sound wall, the Midbayfront project and traffic related to the export of excavation material are 47, 48 and 49 respectively.

The reference to a sound wall on page 71 of the DEIR is incorrect. The wall which would need to be relocated is actually an existing low barrier wall which separates parking facilities for the medical office building along H Street from the roadway. The discussion on page 71 has been corrected in the FEIR. Since the existing low barrier wall does not currently provide noise attenuation, no noise effects would be associated with removal of the wall. In addition, as discussed in response to comment #15, it is anticipated that the visual character along H Street in the vicinity of Fourth Avenue would be improved with the widening of H Street since the existing medical office building and parking facilities would be removed, providing room for additional landscape elements. In conjunction with site-specific design for the H Street widening, it is anticipated that a barrier or screening would be provided between the widened roadway and the remaining parking facilities. It is anticipated that the barrier proposed at that time would be more effective and more aesthetically pleasing than is the current structure. Page 71 now reads as follows:

"Current volume/capacity ratios and the levels of service (LOS) at the 4 critical intersections and 6 street segments were calculated. The intersection ratios and LOS were calculated utilizing the Intersection Capacity Utilization (ICU) methodology. Level of Service is a term used to describe prevailing conditions and their effect on traffic. Level of Service (LOS) is a qualitative measure of the effect of such factors as travel speed, travel time, interruptions, freedom to maneuver, safety, driving comfort and convenience. Six levels of service, A through F, have been defined in the Highway Capacity Manual of 1965. Level of Service A describes a condition of free flow, with low traffic volumes and relatively high speeds, while Level of Service F describes forced traffic flow at low speed with volumes below capacity. Existing intersection

COMMENTS

RESPONSES

volumes and detailed ICU calculations are included in Appendix A of this EIR. The current levels of service (LOS) and volume/capacity ratios are listed in Table 2.

As shown on Table 2, all of the intersections are operating at LOS C or better under existing morning and evening peak hours. However, it should be noted that narrow lane widths on H Street west of Fourth Avenue along with turning movements to and from the shopping center south of H Street tend to create side friction and affect capacity in this corridor. Specifically, H Street west of Fourth Avenue has substandard geometrics at this time. The north side of this roadway consists of two 10-foot travel lanes and a 5-foot sidewalk immediately adjacent to an apartment wall. Besides reducing capacity adjacent to the H Street/Fourth Avenue signalized intersection, drivers tend to feel "cramped" and unsure of overall roadway conditions. This situation prohibits the possibility of eastbound to westbound U-turns at Fourth Avenue. The ultimate widening of H Street is an off-site requirement that would affect two properties - an office facility and a residential condominium facility at the corner of Fourth Avenue and H Street. The widening can be accomplished without the demolition of any residential units, however, additional right-of-way would be required resulting in the relocation of an existing sound-wall existing low barrier wall which separates parking facilities for the medical office building from H Street. Widening would require the demolition of the existing medical office building along H Street and some of the existing parking area. The existing medical office building is owned by the applicant."

COMMENTS

RESPONSES

48.

The cumulative traffic analysis included in the DEIR assumed buildout of the Midbayfront property as projected in the adopted General Plan. In August of 1991, an EIR was certified for a Midbayfront project. The discretionary actions included a General Plan Amendment and a Local Coastal Program Amendment. The City Council then continued the project and referred it back to City staff to review and reanalyze the project due to a number of significant impacts including proposed land use intensity which was much greater than that allowed in the adopted General Plan. At this time, the outcome of the Midbayfront project is uncertain and, according to Chula Vista Community Development staff and the City Traffic Engineer, assuming buildout of the Midbayfront property as projected in the adopted General Plan and Local Coastal Program (the land uses are identical) is the appropriate information to use for the cumulative traffic analysis.

Page 15 (2nd 31): The traffic analysis used the General Plan Scenario 4 buildout travel forecasts and traffic counts for the proposed Chula Vista Mall Expansion and the Rohr Industries project. The traffic counts for the Midbayfront project were not included unless they are included in the Scenario 4 forecasts. Since the Midbayfront project is adjacent to the Rohr Industries project, and uses E and W Streets as access points, the Midbayfront traffic counts should be included.

48

Page 22 (4th 31): The EIR notes that the grading associated with the basements and parking structure would require exporting of soil from the site. The traffic section concludes that impacts would be mitigated to below level of significance with implementation of the recommended mitigation measures. However, the EIR does not contain any information concerning the number of trips that would be associated with the export of soil, nor the impacts these additional trips would have on the street network. A discussion of these impacts should be included even though they would be temporary impacts.

49

49.

Approximately 32,000 cubic yards of material would be excavated and exported from the site in conjunction with project Phase Ultimate development. The excavation and exportation of material in Phase Ultimate would occur in conjunction with construction of the parking structure, the medical office building and the hospital. These three construction activities would occur at separate times over a 10-15 year time span when Phase Ultimate will be built out. Assuming 10,600 cubic yards of export material per construction activity and a 90-day construction period per activity and assuming 20 cubic yards of material per truck load, approximately 6 truck trips would occur per day per construction activity. It is anticipated that most of these trips would occur midday and not during peak hours. Although this impact is considered insignificant, a construction traffic control plan would be implemented. Requirements of a traffic control program may include: detour signs, flagmen and delineators.

RESPONSES

50.

As shown on Table 5, pg. 85 of the DEIR, the distance of the microphone from the centerline of the street when measuring noise levels, was 30 feet on 5th Avenue. Measurements to the school building from the centerline of the street is approximately 66 feet. According to San Diego Acoustics, the acoustical engineer for the project, noise decibels would decrease approximately 3 dB from the 64 Leq measured at 30 feet from the centerline, to approximately 61 Leq at the school building located 66 feet from the centerline. Therefore, if the 2.5 dB increase that is anticipated to occur in the area is added to the Leq at the school building, the noise level would be 63.5 dB(A) which is lower than the reasonable limit of 65 dB(A) for a school site. The conclusion of no significance found in the noise section of the DEIR is correct.

51.

The proposed project represents infill development in an existing urban area. The technical study required on page 122 of the DEIR is intended to determine the best method of sewage disposal for the proposed project based on use of existing sewer facilities. No new facilities or significant capacity increases would be associated with project implementation which would result in growth inducing impacts.

As noted in response to Comment #'s 6 and 40, a separate EIR is being prepared for the expansion of the Chula Vista Shopping Center. That EIR (EIR 91-04, SCH #91051042) addresses sewage disposal requirements for the proposed mall expansion. Page 64 of the DEIR for the shopping center expansion states that a technical report addressing sewage disposal requirements for the shopping center project will be required. According to the DEIR, the report must address existing flows "as well as projected flows from the proposed Chula Vista Mall expansion and Scripps Memorial Hospital expansion." The DEIR for the mall expansion also notes that existing sewer lines on H Street west of the project site are currently operating at 97% capacity during peak flow conditions, well above the desired operation at 50% capacity. According to the DEIR for the mall expansion, "the developer will be required to construct improvements, as established by the City in conditions of approval, to bring the downstream sewers to design capacity."

COMMENTS

50

Page 85-87, (Noise Analysis): Table 5 (pg. 85) indicates that the existing Leq noise level on Fifth Avenue is 64 dB(A). Page 86 (2nd ¶) states that a reasonable limit for peak-hour noise outside the window of a school room is 65 dB(A). On page 87 (2nd ¶) the EIR indicates that the noise levels on Fifth Avenue would increase by 2-7 to 2-5 dB. Consequently, the post-project noise levels at the school site north of the project would be 66.2 to 66.5 dB(A).

The paragraph's concluding statement is that, "This increase is not regarded as significant in the context of existing ambient noise levels". Since the 65 dB(A) level is related to the standards established by the State of California Streets and Highway Code, the EIR should identify mitigation measures to insure that the noise levels within classrooms do not exceed State standards.

51

Pages 119, 121, 122 (Sewer Services): The EIR reports that portions of the G and H Street sewers are flowing near or over capacity. The applicant proposes to pump all sewage to the G Street sewer line so as to not overload the H Street sewer line. The recommended mitigation measure is to have a technical study prepared to the satisfaction of the City Engineer.

This process excludes the public from reviewing and commenting on the actions that would be recommended and the environmental consequences that may result from sewer line improvements. These improvements are clearly project-related off-site impacts that need to be addressed in the EIR. The California Environmental Quality Act is very clear that the "project" includes the "whole of an action" (Section 15378). One of the basic policies of CEQA is to "inform other governmental agencies and the public generally of the environmental impact of a proposed project" (Section 15003).

The growth-inducing effects of increasing the sewer line capacity are not discussed in the EIR. In fact, the growth inducing section of the EIR (pg. 129) states that the project would be served by existing facilities and that no extensions would be required. This discussion completely ignores the expansion of capacity which could lead to a growth inducing effect.

Cumulative impacts should also be discussed with regard to the sewer line expansion. The EIR notes (pg. 39) that the Chula Vista Shopping Center is being proposed for expansion. The shopping center is adjacent to the proposed hospital expansion. What are cumulative effects of the two separate projects on sewer service? Will the H Street line need to be expanded for the shopping center? If so, should that expansion also serve the hospital? These questions should be answered prior to the decision-makers certification of this EIR.

RESPONSES

As noted in response to Comment #48, the cumulative analysis in the DEIR assumed development of the Midbayfront property as anticipated in the adopted General Plan.

52.

Implementation of the Rohr Office and Chula Vista Mall expansion projects were assumed in the cumulative traffic analysis. As stated on pg. 76 of the DEIR, the 7,500 ADT assumed for the project zone includes General Plan Buildout as well as the Rohr office and Chula Vista Mall. The 1,500 ADT of General Plan that the project will produce is over the 7,500 ADT assumed for General Plan Buildout and Rohr office and Chula Vista Mall. As stated in the DEIR, all traffic impacts will be mitigated to below a level of significance.

53.

COMMENTS

Page 125 (2nd fl): The study area for cumulative projects includes development projects within a one-mile radius. The Midbayfront project is within one-mile and adjacent to the Rohr Office Expansion project; however, it is not included within the cumulative impacts analysis. This large-scale mixed-use project encompasses approximately 4 million square feet of development within the City's defined "Urban Core". A project of this scale clearly needs to be included in the cumulative effects analysis. The Midbayfront EIR was certified by the City Council on August 20, 1991. The most obvious cumulative issues that need to be addressed are traffic and visual quality. The Midbayfront project EIR has an extensive discussion of visual quality impacts related to high-rise buildings.

52

Page 125 (2nd fl): The cumulative traffic analysis indicates that the proposed hospital expansion will generate 1,500 more trips than anticipated in the General Plan travel forecast. The Rohr Office and Chula Vista Mall expansion are mentioned in this discussion, but it is not clear if their traffic is included in the General Plan forecast or are in addition to the General Plan travel forecast. Questions that need to be answered are:

53

- What are the cumulative traffic flows resulting from the Rohr, hospital and shopping center expansions?
- By how many trips does the cumulative flow exceed the General Plan traffic forecast?
- Would this increase in traffic volumes adversely affect the levels of service?

COMMENTS

54 Page 129 (2nd 1): The one paragraph discussion of growth inducement is deficient in addressing the growth inducing potential of the proposed project. A growth-inducing impact discussion is to include,

(7) the way in which the proposed project could foster economic or population growth . . . either directly or indirectly in the surrounding environment . . . (and) the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively (Section 15126(f)).

Hospitals typically attract medically related business, such as pharmacies, doctor offices, etc. to the area surrounding the hospital. The EIR ignores the potential of an expanded hospital to stimulate additional growth in the area that could lead to indirect significant impacts (e.g., land use changes, traffic, public services, etc.).

The Socioeconomic Considerations report (pg. 8, Appendix C) indicates that the entire office building is likely to be occupied by physicians or other personnel associated with the hospital. The growth inducement section (pg. 129) states that the hospital expansion may attract other medical office businesses to the area that would, in general, locate on-site in the proposed medical office building.

The EIR is unclear as to whether or not the "other medical office businesses" are the same as the "physicians or other personnel" referred to in Appendix C. If the "other medical office businesses" are additional businesses, the EIR should describe the availability of existing office space, and/or the likelihood that the hospital would induce the construction of more medical office buildings in the area.

RESPONSES

54.

As stated on page 129 of the DEIR, growth inducing impacts associated with implementation of the proposed project are not anticipated to be significant since the proposed project is located in an existing urban area and would be served by existing services and facilities. Both the DEIR and the Socioeconomic Considerations Report conclude that other medical office uses which may be attracted to the project area as a result of project implementation would be accommodated on-site in the proposed medical office building. The environmental impacts of the proposed medical office building on site are addressed in the DEIR. Please refer to Item #5 of Attachment A to these responses for more detailed responses to growth inducement comments on the Socioeconomic Considerations Report.

COMMENTS

Page 122 (4th ¶): The Relationship Between Local Short-term Use of the Environment and Maintenance and Enhancement of Long-term Productivity section concludes that "enhancement of long-term impacts associated with displacement of the existing commercial facilities are anticipated with respect to community character. As previously noted (comment concerning pg. 33, and 3) the EIR does not address potential impacts to the business being displaced. These impacts should be addressed in the current EIR rather than deferring the analysis to a future environmental study.

Page 130 (2nd ¶): This paragraph states that Scripps Memorial Hospital would continue to operate over 100% capacity. However, the Socioeconomic Considerations study (Appendix G, pg. 3) states that the hospital had an occupancy rate of 83.2% in 1989. An occupancy rate of 83.2% doesn't indicate an overcrowded condition. The information presented in the EIR is contradictory and needs to be clarified.

If the expanded hospital operates below capacity, the subsidy required from the Redevelopment Agency may be considerable. The Socioeconomic Considerations analysis contains the following recommendation:

The City should review future proposals for construction or expansion of hospitals and other medical facilities, in order to balance supply with anticipated demand for such facilities.

Such a study should be undertaken before approval of the proposed Scripps Hospital Expansion. Given that the Community Hospital already is expanding its facility and the Kaiser Permanente is proposing the construction of a hospital in Eastlake, a study of future needs before approval of the Scripps proposal would be timely.

The Socioeconomic Considerations report summarizes the current and proposed hospital beds, and occupancy rates, in Chula Vista as follows.

	Hospital Beds		Occupancy Rate (%)
	Current	Proposed Total	
Scripps Community	159	218	72.4
Total	290	468	77.7
County-wide			61.4
Kaiser	450	450	
Total	628	918	

The report also states that between 1990 and 2000, there will be a demand for approximately 300 additional beds in general acute care in the South Bay area. With the addition of Kaiser Permanente 628 hospital beds would be added in Chula Vista. This would result in 328 more beds than projected as needed by the Socioeconomic Consideration study (see Appendix G pg. 2, 4th ¶).

RESPONSES

- 55.** Please refer to response to Comment # 37 and 29. Potential economic impacts to the businesses proposed to be relocated are not regarded as an environmental issue.
- 56.** Please refer to Item #1 of Attachment A to these responses for a response to this comment.

RESPONSES

The discussion on page 135 is based on the project description information supplied by the H Street Business Coalition. As shown on the H Street Business Coalition site plan, the alternative proposed to build a 5-story medical office building with Phase I of the project. This would mean that a 5-story medical office building would be developed with Phase Ultimate. In conjunction with its review of the proposed project, the City of Chula Vista DRC has indicated that location of a 5-story medical office building in close proximity to Fifth Avenue and H Street would not be desirable from a visual quality standpoint. If the proposed alternative redesigned its site plan with respect to the medical office building to be the same as the proposed project, visual impacts of the medical office building would be similar to those associated with the proposed project.

Page 138 of the DEIR states that a westbound auxiliary lane on H Street would also be required under this alternative as under the proposed project.

COMMENTS

Page 135 (tbl 31): The "H" Street Business Coalition alternative land use/visual quality analysis does not consider the possibility of constructing a 6-story medical office building wing in phase I and a 4-story medical office building wing in the ultimate phase. This phasing would be the reverse of the phasing in the proposed project. The visual quality effects would then be the same as the proposed project.

Page 138 (tbl 31): The recommended traffic mitigation for the "H" Street Business Coalition alternative is to widen "H" Street by two to four feet to accommodate a raised median. Wouldn't the other mitigation measures for the proposed hospital expansion (see pg. 83) also be required?

57.

58.

COMMENTS

Page 143 (Ord. 51): The EIR notes that, "It is unclear under this alternative if the northwest portion of the site would be dedicated to the Sweetwater High School District . . ." The EIR further states that, "If it is not dedicated, impacts to the Sweetwater High School District may occur with redevelopment of the site." However, there is no identified impact. We understand that the Scripps Hospital Expansion proponents initiated an offer to dedicate land to the School District. During meeting between representatives of the District and Circinus Corporation, the District did not request that land be dedicated to the District.

The No Project alternative (pg. 130) does not identify an impact if the site does not redevelop. If there is no impact if the site remains in its current state, why would there be an impact if the site redevelops with similar commercial activities?

As noted on pg. 36, the project applicant (Scripps Hospital) is considering trading a portion of the site to the School District in return for an access from "C" Street. The "No G Street Access" alternative does not identify an impact to the School District if the exchange of land does not occur. Consequently, the EIR selectively identifies an unspecified impact for the retail and entertainment alternative that was not identified for other alternatives.

59

RESPONSES

59.

The comment is noted. The referenced sentence has been deleted from the FEIR and the discussion has been revised to state that if the Retail and Entertainment Alternative is selected, discussions with the school district would need to take place regarding potential provision of space for a junior high classroom. As noted on page 120 of the DEIR, the proposed hospital expansion project "would correct existing storm drain flooding problems affecting the adjacent junior high school by ducting the storm drain into the hospital's proposed storm drain system." The extent to which this would occur under the Retail and Entertainment Alternative would need to be addressed if that alternative is selected. Page 143 of the FEIR now reads as follows:

"commercial uses proposed on-site would include restaurants, convenience restaurants, a theater, a roller skating rink, a bank, a readicare and a child care facility. Currently, approximately 109,950 square feet of commercial uses are present on the site, of which 80,600 square feet is the swap meet building which has been re-leased to Jetco Furniture and other concessionaires. Under this alternative, a total of 124,990 square feet of active commercial uses would be provided. These uses would be consistent with the General Plan and meet the goals and objectives of the Town Centre II Redevelopment Plan.

Although the existing hospital would remain under this alternative, no hospital expansion would occur. This alternative would not implement the proposed project but would represent an alternative use for the site.

It is unclear under this alternative if the northwest portion of the site would be dedicated to the Sweetwater Union High School District for construction of a junior high school classroom in this area as is planned with the proposed project. If this alternative is selected, discussion with the school district would need to take place regarding provision of space for a junior high classroom. If it is not dedicated, impacts to the Sweetwater Union High School District may occur with redevelopment of the site. Potential health impacts as discussed in the EIR for the hospital expansion would not occur under this alternative since no hospital expansion would occur, however these impacts were not considered significant or unmitigable. Potential retail and entertainment uses under this alternative would need to be evaluated with respect to compatibility with the adjacent junior high school to the north. Impacts with respect to geology/soils, water conservation and schools would be the same under

RESPONSES

this alternative as under the proposed project. If this alternative is selected, further environmental and design review would be required and these impacts would be addressed at that time.

Land Use/Community Character/Visual Quality

Under this alternative, the hospital expansion project would not occur, and instead retail and entertainment uses would occur on the 8.9 acre parcel located at the corner of Fish Avenue and H Street. These uses are consistent with both the Chula Vista General Plan and the Town Centre II Redevelopment Plan goals and objectives. No community that if the Retail and Entertain Alternative is selected, discussions with the school district would need to take place regarding potential provision of space for a junior high classroom."

COMMENTS

COMMENTS

RESPONSES

60.

The specific nature of retail and restaurant uses proposed under the Retail and Entertainment Alternative have not been defined. Certain restaurant and retail uses could be considered to be incompatible with a junior high school such as restaurants or stores serving liquor or selling or renting adult reading material or video tapes. None of the existing commercial uses on site serve or sell liquor, and/or adult reading material or video tapes. As stated on page 143 of the DEIR, the specific nature of such uses would need to be evaluated for compatibility with the junior high school if the Retail and Entertainment Alternative were selected.

PAGE 141 (Jrd 11, Allen, Epc, Pg. 144, LEX 11): This paragraph also states that "potential retail and entertainment uses under this alternative" would need to be evaluated with respect to compatibility with the adjacent Junior High school to the north". As shown in the following comparison, the type of uses proposed in the alternative are the same type of uses currently existing on site.

Existing Use	Sq. Ft.	Retail/Entertainment Alternative	Sq. Ft.
Fiesta Cinema	9,350	Theater	24,000
Readicare (Med Ofc)	3,250	Readicare	3,500
1st Interstate	6,750	1st Interstate Restaurant	6,500
Farrall's Ice Cream	5,600	Arby's	2,000
Captain Kidd's	1,950	Roller Skating	20,000
Arby's	2,450	Retail	23,480
Express Gasoline	9 pumps	Food Retail	10,750
Skateland*	80,600	Service Retail	20,500
		Child Care	1,800
		Total	124,990
		Increased Sq. Ft.	15,040
* Indoor Swap Meet			
Total	109,950		

The EIR does not identify any incompatibilities between the existing commercial uses and the junior high school. An increase of 15,040 sq.ft. (14%) of similar uses does not create any incompatibility with the junior high school. Based on the similarity of uses proposed by the retail and entertainment alternative to existing uses, we believe that there would be no significant impacts.

COMMENTS

RESPONSES

Page 151 (4th fl): The discussion of an Alternative Site Location states that a vacant 13-acre site does not exist in the urban core that could accommodate the proposed project. Since the Redevelopment Agency is seeking to redevelop an existing commercially developed site, the realistic Alternative Site Location would be another developed commercial site in the urban core area. As noted on page 152, other alternative site options include the area to the north or east of the existing hospital. The applicant acting alone, or in conjunction with the Redevelopment Agency could acquire one of these locations. Either one, or both, of these options should be fully examined in the EIR.

61

61. As stated on page 151 of the DEIR, a primary objective of the proposed project is expansion of the existing on-site hospital use. This objective could not be met with redevelopment of another existing commercially developed site. The issues associated with expansion of the existing hospital to the north and east are described in detail on page 152 of the DEIR.

Page 151 (4th fl): According to this paragraph the applicant states that, "... the existing hospital facility is currently overcrowded and patients are going outside Chula Vista to receive medical care". This statement is contradicted by information in the Socioeconomic Considerations report (page 2, Appendix C). The report states that the occupancy rate for Scripps Memorial Hospital was 81.2% in 1989 (see following table). While this is higher than the county-wide average, it does not indicate that the facility is operating at "overcrowded" conditions. Further, the occupancy rate for the Chula Vista Community Hospital is 77.7%, even less than Scripps. Patients may go outside Chula Vista for medical care, but the explanation must relate to factors other than overcrowded hospital conditions. (See also comment concerning page 139 2nd fl).

62

62. Please refer to item #1 of Attachment A to these responses for a response to this comment.

Conclusion

The above comments concerning the Recirculated Draft EIR are submitted for the Agency's consideration. We anticipate that the Final EIR will contain responses to the comments as required by CEQA. As noted in the comments, there are sections of the Draft EIR which we believe contain an inadequate analysis of impacts. Your consideration of these comments is appreciated, and if there are any questions concerning the comments, please contact me.

Sincerely,


Philip L. Hinstov

cc: Mr. Wayne Wencke
Mr. William J. Schwartz, Jr.
Mr. Tim Nader
Mr. Donald Read
Mr. James J. Eischen, Jr., Esq.
Mr. Richard R. Freeland, Esq.
Mr. Paul Peterson, Esq.
Mr. Ralph Kostant, Esq.
Mr. Chris Salamone
Mr. Will Hyde
Mr. John Goss
Ms. Barbara Gilman
Mr. Robert Fox
Mr. Andrew B. Campbell
Ms. Kate Shurson
Dr. Liawellyn Lieber

Attachments
A Marchall E. Bankin Letter dated 9/18/91

F:\Philip\EIR\Scriptsp3.306

RESPONSES

63. The comments are noted. They do not reflect on the adequacy or sufficiency of the DEIR and no response is necessary. Please refer to the Introduction of this FEIR as well as Item #6 of Attachment A to these responses for presentation of responses to comments on the Socioeconomic Considerations Report.

COMMENTS



VIA TELECOPIER

September 18, 1991

Mr. Phillip Hinshaw
A.D. HINSHAW & ASSOCIATES
6136 Mission George Road, Suite 111
San Diego, CA 92120

RE: Citicorus Chula Vista Property
NEC 5th & H Streets

Dear Mr. Hinshaw:

Pursuant to your request, the following letter expresses my views as to the suitability of the above captioned property for support retail oriented land use, as opposed to its development as an expansion of an existing adjacent hospital. This property is located immediately north of the Chula Vista Mall regional shopping center. As such, the following comments reflect my experience with regional malls in this context.

63

Following numerous beginnings in the 1950's decade (and even earlier in some instances), through a process of trial and error, the modern concept of a regional shopping mall was crystallized. It became apparent in that period to major retailers, developers, and the lending community that stores merchandising apparel and other department store type comparison goods merchandise achieved higher sales levels when located together in clusters than what they achieved when positioned in a dispersed pattern. These principles became known as "cumulative attraction" and "synergism." The Chula Vista regional mall is a typical example. It opened in the year 1960, which happened to be the same year these principles were first formalized in the classic work entitled "Shopping Towns, U.S.A.", by architect Victor Gruen, and economist Larry Smith.

As regional centers became the dominant comparison goods food in their market areas, it also became apparent that stores selling convenience goods type merchandise (those types of everyday needs sold in food markets, drug stores, and other super-type stores), usually did not perform well when located in regional malls. The customer generally did not wish to shop for a dress and a loaf of bread on a trip to the mall.

COMMENTS

Mr. Phillip Hinsdale
September 18, 1991
Page 2 of 3

Rather, there evolved in the late 1960's and 1970's decades, the concept of mall peripheral or "fringe" development, wherein such support retail came to cluster around malls to take advantage of the very strong attraction of the mall itself, yet provide the convenience of being able to drive right up to the store and park.

This fringe land use concept has worked so well, that while a regional mall has become one of the "higest and best" of land uses, the fringe property surrounding it has in many cases become more valuable than the mall itself, a higher and better land use. In fact, there are numerous instances wherein malls were built as a means of stimulating the development of fringe retail and other peripheral projects, rather than as the end in itself. For example, in the Chicago area, at least four major malls have been developed on this basis.

It is not surprising that a recent "Dollars and Cents of Shopping Centers", published by the Urban Land Institute, showed that the type of smaller shopping centers envisioned for the Cretinus property on the fringe of Chula Vista Mall averaged \$167.56 per sq. ft. in sales nationally, versus \$157.32 per sq. ft. for regional malls, a 6.5% advantage. (In this context, I would expect per square foot retail sales productivities on your property to certainly exceed those at Chula Vista Mall if properly developed).

Thus, the synergism of complementary retail facilities has evolved to the land use pattern typically seen surrounding most of the newer suburban regional malls in the nation. This is an array of planned fringe facilities dominated by the type of support retail developments proposed on the Cretinus property opposite Chula Vista Mall. Of course, non-complementary land uses such as hospitals are occasionally seen on the periphery of malls (many of which predate the malls they are adjacent to), but in the hierarchy of highest and best uses for land adjacent to multi complementary support retail such as proposed for the Cretinus property adjacent to Chula Vista Mall, stand logically high on the list.

In contrast, the hospital expansion also proposed for this property is not synergistic, or complementary, and as such, certainly does not reflect the highest and best approach to land use and land planning.

Furthermore, from another point of view, since a regional mall generally attracts more vehicles to a given single location than does any other single land use, on a continuing basis, it would seem there could hardly be chosen a more deleterious environment to plan for hospital expansion. Exacerbating the situation of an existing hospital operating in such an environment by expanding in a direction adjacent to the mall would hardly seem prudent and municipally responsible in any view.

Sincerely,

Marshall E. Buckle

Marshall E. Buckle
Senior Vice President

MEB:ejp

RESPONSES

COMMENTS

RESPONSES

- 64.** Please refer to the Introduction to this FEIR as well as Attachment A to these responses for a response to this comment, specifically Item #2 of Attachment A for comments regarding estimated tax revenues, Item #3 for timing of tax revenues, and Item #6 for complementary land uses.

CIRCINUS CORPORATION

P.O. Box 803, Rancho Santa Fe, CA 92067

September 23, 1991

Ms. Maryann Miller
Environmental Review Coordinator
City of Chula Vista Planning Department
P.O. Box 1087
Chula Vista, CA 91912

RE: EIR #90-07

Dear Ms. Miller:

This letter is being prepared as part of the public review process for the above referenced Environmental Impact Report and the scope of this letter shall be limited to the economic feasibility portion of the EIR.

This portion of the EIR is very important as the economics of this redevelopment project seem to be influencing the decision makers, as should be the case. While I believe that the study is generally thorough in scope, I still have some serious concerns about conclusions that have been made in this study.

An economic model is only as good as the data that is put into it and in the case of the models used to project the future cash flows for the Scripps and Circinus plans this is particularly true. These models have been used to conclude that the Circinus Proposal produces the same tax revenues as the Scripps Phase Ultimate Proposal.

This conclusion is not accurate because the timing of the cash flows presented in the models are not correct and when adjusted to reflect more closely the reality of the two projects, generates different results. These adjusted cash flows show that in reality, the Circinus Proposal could in fact generate 21% to 49% greater revenues to the City of Chula Vista than the Scripps Proposal. Please review the attached memo and backup material regarding this point.

Additionally, the study uses the Circinus "30% new sales" scenario to draw the conclusion that it generates the same revenues as the Scripps Phase Ultimate scenario. The study also analyzes a "60% new sales" scenario for the Circinus Proposal, but bases the conclusions on the 30% scenario. It seems to me that a realistic way to present the Circinus results would be to state a range between the two scenarios, if this would be not important then why were two scenarios analyzed and presented?

Q 019 568 7503

For 019 568 3110

RESPONSES

COMMENTS

The study also concludes that because Chula Vista has greater retail sales per its share of the county population than the city is over supplied with retail services. The study also concludes that the Chula Vista economy is not in a recession. There are roughly 1 million people living in Tijuana. This compares to approximately 2.5 million people living in San Diego County. In addition, the San Ysidro Border Crossing is the busiest border crossing in the world with 30 million "legal" crossings per year. I am sure that this has an effect on the retail sales generated in the City of Chula Vista and should be acknowledged.

According to the economic study, the Chula Vista Shopping Center has annual sales per square foot of \$133 as compared to Plaza Bonita with sales of \$218 per square foot. This infers that the Chula Vista Shopping Center has sales of 30% less per square foot than the other major mall in the area. This is a major difference that has been used by this study to conclude that the city may have largely satisfied the demand for consumer shopping centers. It comes in the area of the mall is not functioning to draw commercial dollars to that area. Expanding a hospital in a commercial/retail corridor in hopes of revitalizing retail sales does not seem logical. If this were true, new malls would plan to have hospitals built adjacent to them. Please refer to the attached letter from Marshall Haskin which expands upon this point.

To address the fact that the hospital expansion would increase the number of employees in the area substantially I would like to point out that while it is most likely true that they would have an impact on the economy but that this cannot be concluded until an impact study is done to analyze this effect. To my knowledge, there has been no study done to support any substantial conclusions about this effect. The study also indicates that there would be net increase of 374 jobs for the Circinus Proposal. Accordingly, the hospital plan exceeds the retail plan in net employees added by 374. These figures, I assume are reasonable, however I do not clearly understand what is being inferred with them. Is the study inferring that these 374 additional employees will help close the gap between the \$133 per square foot sales at the Chula Vista Shopping Center and the \$218 per square foot sales at Bonita Plaza. Or these employees to increase sales at the Chula Vista Shopping Center. However, the shopping center has 11 million sales \$1,000 per year. It is likely that the study is not inferring this. I am sure that the reader could be confused as to the practical relevance of this net employee gain analysis.

The issues that I have discussed in this letter support why I am concerned with the conclusions drawn from the economic study portion of the study. In my opinion this study is not ready for publication. I am confident that the study should be redone to take into consideration the issues that I have outlined herein.

Cordially,
CIRCINUS CORPORATION

Michael A. Jacobs

Michael A. Jacobs
Vice President/Redevelopment

HAI:ws

CC:Wayne Hencke, Joe Solomon, Phillip Hinshaw

Attachments

COMMENTS

RESPONSES

65. Please refer to the Introduction to this FEIR as well as Item #3 of Attachment A to these responses for a response to this comment.

CIRCINUS CORPORATION

INTER-OFFICE
MEMO

DATE: September 19, 1991

TO: Wayne Hencke

FR: Michael Jacobs *MJ*

RE: Analysis of tax revenue figures as presented in the EIR #90-07.

The cash flow models used in the economic study presented in the EIR do not accurately reflect the correct timing of key income streams.

For instance, the Scripps Hospital Phase Ultimate cash flows are phased in too early. Documentation shows that Phase Ultimate will not be completed for another ten to fifteen years. The model shows completion between nine and ten years from now. To be more realistic, the cash flows should be shown to phase in sometime between the years 2002 and 2007, say the year 2004 - 2005. When this change is made, the present value revenue from the Scripps Proposal decreases to \$2,037,071 or rounded to \$2,000,000. A reduction of 13%.

The phasing in of revenues for the Circinus Proposal need to be adjusted. It will be assumed that the correct tax increment reality, the sales tax revenues and the property tax increment revenues will be apparent one year earlier than shown in the models presented in the economic study. When these changes are made, the present value of the revenue streams increases to between \$2,500,000 (30% new sales) and \$3,000,000 (60% new sales). Both of these figures have been rounded concurrent with the economic study found in the EIR. This is an increase of 3% over the original figures presented in the EIR.

These changes are subtle, however, when implemented, they show that the Circinus Proposal could prove to generate 21% to 49% more revenues than the Scripps Proposal as outlined in the EIR. I find these increases significant.

Please note the summary of my results and the actual models that I used which can be found in the attached pages.

RESPONSES

COMMENTS

SUMMARY OF REVENUE PROJECTIONS

	PSB P's (\$18,490-07)	Adjusted P's	Differences
Stripline Phase Utilities			
Property Taxes	1,429,410	1,334,418	(94,992)
Sales Tax	202,780	182,453	(20,327)
Utility & Promote Tax	511,800	511,800	0
Total	2,143,990	2,028,671	(115,319)
		Reduced	115,319
Circleline Proposal (202 New Sales)			
	PSB P's (\$18,490-07)	Adjusted P's	Differences
Property Taxes	1,487,175	1,412,134	(75,041)
Sales Tax	596,127	650,130	54,003
Total	2,083,302	2,062,264	(21,038)
		Increased	196,948
			\$1
Circleline Proposal (202 New Sales)			
	PSB P's (\$18,490-07)	Adjusted P's	Differences
Property Taxes	1,487,175	1,412,134	(75,041)
Sales Tax	1,105,219	1,211,381	106,162
Total	2,592,394	2,623,515	31,121
		Increased	252,971
			\$1

COMBINED SUMMARY OF ADJUSTED TOTAL STRIPE PROJECTIONS

	Total Revenue	Increase Over Stripline
Stripline Phase Utilities	2,028,671	0
Circleline Proposal (202 New Sales)	2,062,264	33,593
Circleline Proposal (202 New Sales)	2,623,515	211

CONCLUSION

Based upon adjustments (to reflect realistic (low) prices) made to the original projections presented by PSB in its report (PSB 490-07), it can be concluded that the Circleline Proposal shows significantly higher revenues than the Stripline Phase Utilities. Specifically, the Circleline projections come out between 211 and 333 higher than the Stripline Phase Utilities proposal.

RESPONSES

COMMENTS

FM TECHNOLOGIES NUMBER - 812 JPO-07
PROPERTY TAX INCREMENT PROJECTIONS - RECEIPTS PHASE ULTIMATE

Fiscal Year	Assessed Valuation	Previous Valuation	Percent Increase	Rate or %	Added By (Adj) For	Assessed Valuation	Instrumental Valuation	Estimated Tax	County Share	Annual Revenue to Ohio
01 1987-88	3,152,413	0	0	0	0	3,152,413	0	0	0	0
02 1988-89	3,152,413	0	0	0	0	3,152,413	0	0	0	0
03 1989-90	3,152,413	0	0	0	0	3,152,413	0	0	0	0
04 1990-91	3,152,413	0	0	0	0	3,152,413	0	0	0	0
05 1991-92	3,341,133	0	0	0	0	3,341,133	0	0	0	0
06 1992-93	4,411,401	0	0	0	0	4,411,401	0	0	0	0
07 1993-94	5,331,183	0	0	0	0	5,331,183	0	0	0	0
08 1994-95	6,254,724	0	0	0	0	6,254,724	0	0	0	0
09 1995-96	7,177,117	0	0	0	0	7,177,117	0	0	0	0
10 1996-97	8,100,000	0	0	0	0	8,100,000	0	0	0	0
11 1997-98	9,022,883	0	0	0	0	9,022,883	0	0	0	0
12 1998-99	10,000,000	0	0	0	0	10,000,000	0	0	0	0
13 1999-00	11,000,000	0	0	0	0	11,000,000	0	0	0	0
14 2000-01	12,000,000	0	0	0	0	12,000,000	0	0	0	0
15 2001-02	13,000,000	0	0	0	0	13,000,000	0	0	0	0
16 2002-03	14,000,000	0	0	0	0	14,000,000	0	0	0	0
17 2003-04	15,000,000	0	0	0	0	15,000,000	0	0	0	0
18 2004-05	16,000,000	0	0	0	0	16,000,000	0	0	0	0
19 2005-06	17,000,000	0	0	0	0	17,000,000	0	0	0	0
20 2006-07	18,000,000	0	0	0	0	18,000,000	0	0	0	0
21 2007-08	19,000,000	0	0	0	0	19,000,000	0	0	0	0
22 2008-09	20,000,000	0	0	0	0	20,000,000	0	0	0	0
23 2009-10	21,000,000	0	0	0	0	21,000,000	0	0	0	0
24 2010-11	22,000,000	0	0	0	0	22,000,000	0	0	0	0
25 2011-12	23,000,000	0	0	0	0	23,000,000	0	0	0	0
26 2012-13	24,000,000	0	0	0	0	24,000,000	0	0	0	0
27 2013-14	25,000,000	0	0	0	0	25,000,000	0	0	0	0
28 2014-15	26,000,000	0	0	0	0	26,000,000	0	0	0	0
29 2015-16	27,000,000	0	0	0	0	27,000,000	0	0	0	0
30 2016-17	28,000,000	0	0	0	0	28,000,000	0	0	0	0
31 2017-18	29,000,000	0	0	0	0	29,000,000	0	0	0	0
32 2018-19	30,000,000	0	0	0	0	30,000,000	0	0	0	0
33 2019-20	31,000,000	0	0	0	0	31,000,000	0	0	0	0
34 2020-21	32,000,000	0	0	0	0	32,000,000	0	0	0	0
35 2021-22	33,000,000	0	0	0	0	33,000,000	0	0	0	0

Present Value (1991-92) to 2021-22 at 8.33 Discount Rate 1,879,810

COMMENTS

RESPONSES

PROPERTY TAX INCIDENT PROJECTIONS - CIRCUIT JUDICIAL

NO. THOUSANDS DOLLARS - \$10,000=1

Year	Fiscal Year	Assessed Value	Forecast Increase	Forecast %	Added by New Construction	Added by Sale or Conversion	Added by Prior Year	Adjusted Value	Incremental Assessed Value	Estimated Annual Revenue to State
1987-88	1987-88	3,116,423	42,949	1.4%	0	0	0	3,116,423	42,949	620
1988-89	1988-89	3,211,612	44,228	1.4%	0	0	0	3,211,612	127,397	1,272
1989-90	1989-90	3,271,640	45,513	1.4%	0	0	0	3,271,640	187,795	1,927
1990-91	1990-91	3,341,153	46,823	1.4%	2,151,145	0	0	5,492,298	1,241,780	11,432
1991-92	1991-92	3,411,671	48,159	1.4%	0	0	0	3,411,671	1,331,300	11,512
1992-93	1992-93	3,492,833	49,527	1.4%	0	0	0	3,492,833	1,421,820	11,592
1993-94	1993-94	3,575,066	50,927	1.4%	0	0	0	3,575,066	1,513,340	11,672
1994-95	1994-95	3,658,371	52,359	1.4%	0	0	0	3,658,371	1,605,860	11,752
1995-96	1995-96	3,742,748	53,823	1.4%	0	0	0	3,742,748	1,700,380	11,832
1996-97	1996-97	3,828,197	55,319	1.4%	0	0	0	3,828,197	1,796,900	11,912
1997-98	1997-98	3,914,716	56,847	1.4%	0	0	0	3,914,716	1,895,420	12,000
1998-99	1998-99	4,002,305	58,407	1.4%	0	0	0	4,002,305	1,995,940	12,088
1999-2000	1999-2000	4,090,964	60,000	1.4%	0	0	0	4,090,964	2,100,460	12,176
2000-01	2000-01	4,180,693	61,626	1.4%	0	0	0	4,180,693	2,208,980	12,264
2001-02	2001-02	4,271,492	63,287	1.4%	0	0	0	4,271,492	2,321,500	12,352
2002-03	2002-03	4,363,361	64,983	1.4%	0	0	0	4,363,361	2,438,020	12,440
2003-04	2003-04	4,456,299	66,714	1.4%	0	0	0	4,456,299	2,558,540	12,528
2004-05	2004-05	4,550,307	68,481	1.4%	0	0	0	4,550,307	2,683,060	12,616
2005-06	2005-06	4,645,284	70,284	1.4%	0	0	0	4,645,284	2,811,580	12,704
2006-07	2006-07	4,741,230	72,123	1.4%	0	0	0	4,741,230	2,944,100	12,792
2007-08	2007-08	4,838,145	74,000	1.4%	0	0	0	4,838,145	3,080,620	12,880
2008-09	2008-09	4,936,029	75,915	1.4%	0	0	0	4,936,029	3,221,140	12,968
2009-10	2009-10	5,034,882	77,868	1.4%	0	0	0	5,034,882	3,365,660	13,056
2010-11	2010-11	5,134,703	79,859	1.4%	0	0	0	5,134,703	3,514,180	13,144
2011-12	2011-12	5,235,492	81,889	1.4%	0	0	0	5,235,492	3,666,700	13,232
2012-13	2012-13	5,337,249	83,958	1.4%	0	0	0	5,337,249	3,823,220	13,320
2013-14	2013-14	5,440,974	86,067	1.4%	0	0	0	5,440,974	3,983,740	13,408
2014-15	2014-15	5,546,667	88,217	1.4%	0	0	0	5,546,667	4,148,260	13,496
2015-16	2015-16	5,654,328	90,408	1.4%	0	0	0	5,654,328	4,316,780	13,584
2016-17	2016-17	5,763,957	92,641	1.4%	0	0	0	5,763,957	4,489,300	13,672
2017-18	2017-18	5,875,554	94,916	1.4%	0	0	0	5,875,554	4,665,820	13,760
2018-19	2018-19	5,989,119	97,234	1.4%	0	0	0	5,989,119	4,846,340	13,848
2019-20	2019-20	6,104,652	99,595	1.4%	0	0	0	6,104,652	5,030,860	13,936
2020-21	2020-21	6,222,153	102,000	1.4%	0	0	0	6,222,153	5,219,380	14,024
2021-22	2021-22	6,341,622	104,449	1.4%	0	0	0	6,341,622	5,411,900	14,112

Present Value (1994-92 to 2021-22) at 8.1% Discount Rate 1,467,191

RESPONSES

COMMENTS

MA (CONCLUSIVE NUMBER - 215 PRO-07)

ALL TAX INCENTIVES PROJECTIONS : (CIRCULAR PROPOSAL (202 New Sales))

Year	Fiscal Year	State Sales Previous Year	Forecast Increase at 1% New Outlets	Sales Added by State Incentives	Reduced Tax Outlets	State Sales Growth	Total Sales	State Tax Revenue	State Tax Revenue at 1%
11	1990-91	3,150,000	134,000	0	0	3,284,000	32,760	0	32,760
12	1991-92	3,278,000	131,000	0	0	3,409,000	34,070	0	34,070
13	1992-93	3,407,000	134,262	0	0	3,541,262	35,431	0	35,431
14	1993-94	3,542,322	141,733	0	0	3,684,055	36,841	0	36,841
15	1994-95	3,684,055	149,443	0	0	3,833,498	38,301	0	38,301
16	1995-96	3,833,498	157,401	0	0	3,990,899	39,811	0	39,811
17	1996-97	3,990,899	165,707	0	0	4,156,606	41,371	0	41,371
18	1997-98	4,156,606	174,361	0	0	4,330,967	42,981	0	42,981
19	1998-99	4,330,967	183,363	0	0	4,514,330	44,641	0	44,641
20	2000-00	4,514,330	192,715	0	0	4,707,045	46,351	0	46,351
21	2001-01	4,707,045	202,416	0	0	4,909,461	48,111	0	48,111
22	2002-02	4,909,461	212,467	0	0	5,121,928	49,921	0	49,921
23	2003-03	5,121,928	222,868	0	0	5,344,796	51,781	0	51,781
24	2004-04	5,344,796	233,619	0	0	5,578,415	53,691	0	53,691
25	2005-05	5,578,415	244,720	0	0	5,823,135	55,651	0	55,651
26	2006-06	5,823,135	256,171	0	0	6,079,306	57,661	0	57,661
27	2007-07	6,079,306	268,072	0	0	6,347,378	59,721	0	59,721
28	2008-08	6,347,378	280,423	0	0	6,627,801	61,831	0	61,831
29	2009-09	6,627,801	293,224	0	0	6,921,025	63,991	0	63,991
30	2010-10	6,921,025	306,475	0	0	7,227,500	66,201	0	66,201
31	2011-11	7,227,500	320,176	0	0	7,547,676	68,461	0	68,461
32	2012-12	7,547,676	334,327	0	0	7,882,003	70,771	0	70,771
33	2013-13	7,882,003	349,028	0	0	8,231,031	73,131	0	73,131
34	2014-14	8,231,031	364,279	0	0	8,595,310	75,541	0	75,541
35	2015-15	8,595,310	380,080	0	0	8,975,390	78,001	0	78,001
36	2016-16	8,975,390	396,431	0	0	9,371,821	80,511	0	80,511
37	2017-17	9,371,821	413,332	0	0	9,785,153	83,071	0	83,071
38	2018-18	9,785,153	430,783	0	0	10,215,936	85,681	0	85,681
39	2019-19	10,215,936	448,784	0	0	10,664,720	88,341	0	88,341
40	2020-20	10,664,720	467,335	0	0	11,132,055	91,051	0	91,051
41	2021-21	11,132,055	486,436	0	0	11,618,491	93,811	0	93,811
42	2022-22	11,618,491	506,087	0	0	12,124,578	96,621	0	96,621
43	2023-23	12,124,578	526,288	0	0	12,650,866	99,481	0	99,481
44	2024-24	12,650,866	547,039	0	0	13,197,905	102,391	0	102,391
45	2025-25	13,197,905	568,340	0	0	13,766,245	105,351	0	105,351
46	2026-26	13,766,245	590,191	0	0	14,356,436	108,361	0	108,361
47	2027-27	14,356,436	612,592	0	0	14,979,028	111,421	0	111,421
48	2028-28	14,979,028	635,543	0	0	15,634,571	114,531	0	114,531
49	2029-29	15,634,571	659,044	0	0	16,323,615	117,691	0	117,691
50	2030-30	16,323,615	683,095	0	0	17,046,710	120,901	0	120,901

Present Value (1994-95 to 2030-30) at 8.3% (814600) Rate 394,137

RESPONSES

COMMENTS

POP TECHNOLOGIES MAMES - EIS PRO-07
 POP TECHNOLOGIES PROJECTIONS: (Cities Reported, (See New Dates)

Year	Fiscal Year	Taxable Sales Previous Year	Percent Increase at EIS	Added by New Outlets	Subtotal	Subtotal for Streamlined	Taxable Sales Estimated Current Year	Taxable Sales to City
11	1990-91	3,150,000	126,000	0	0	0	3,150,000	31,740
12	1991-92	3,276,000	126,000	0	0	0	3,276,000	33,078
13	1992-93	3,402,000	126,000	0	0	0	3,402,000	34,416
14	1993-94	3,528,000	126,000	0	0	0	3,528,000	35,754
15	1994-95	3,654,000	126,000	0	0	0	3,654,000	37,092
16	1995-96	3,780,000	126,000	0	0	0	3,780,000	38,430
17	1996-97	3,906,000	126,000	0	0	0	3,906,000	39,768
18	1997-98	4,032,000	126,000	0	0	0	4,032,000	41,106
19	1998-99	4,158,000	126,000	0	0	0	4,158,000	42,444
20	2000-01	4,284,000	126,000	0	0	0	4,284,000	43,782
21	2002-03	4,410,000	126,000	0	0	0	4,410,000	45,120
22	2004-04	4,536,000	126,000	0	0	0	4,536,000	46,458
23	2006-05	4,662,000	126,000	0	0	0	4,662,000	47,796
24	2008-06	4,788,000	126,000	0	0	0	4,788,000	49,134
25	2010-07	4,914,000	126,000	0	0	0	4,914,000	50,472
26	2012-08	5,040,000	126,000	0	0	0	5,040,000	51,810
27	2014-09	5,166,000	126,000	0	0	0	5,166,000	53,148
28	2016-10	5,292,000	126,000	0	0	0	5,292,000	54,486
29	2018-11	5,418,000	126,000	0	0	0	5,418,000	55,824
30	2020-12	5,544,000	126,000	0	0	0	5,544,000	57,162
31	2022-13	5,670,000	126,000	0	0	0	5,670,000	58,500
32	2024-14	5,796,000	126,000	0	0	0	5,796,000	59,838
33	2026-15	5,922,000	126,000	0	0	0	5,922,000	61,176
34	2028-16	6,048,000	126,000	0	0	0	6,048,000	62,514
35	2030-17	6,174,000	126,000	0	0	0	6,174,000	63,852
36	2032-18	6,300,000	126,000	0	0	0	6,300,000	65,190
37	2034-19	6,426,000	126,000	0	0	0	6,426,000	66,528
38	2036-20	6,552,000	126,000	0	0	0	6,552,000	67,866
39	2038-21	6,678,000	126,000	0	0	0	6,678,000	69,204
40	2040-22	6,804,000	126,000	0	0	0	6,804,000	70,542
41	2042-23	6,930,000	126,000	0	0	0	6,930,000	71,880
42	2044-24	7,056,000	126,000	0	0	0	7,056,000	73,218
43	2046-25	7,182,000	126,000	0	0	0	7,182,000	74,556
44	2048-26	7,308,000	126,000	0	0	0	7,308,000	75,894
45	2050-27	7,434,000	126,000	0	0	0	7,434,000	77,232
46	2052-28	7,560,000	126,000	0	0	0	7,560,000	78,570
47	2054-29	7,686,000	126,000	0	0	0	7,686,000	79,908
48	2056-30	7,812,000	126,000	0	0	0	7,812,000	81,246
49	2058-31	7,938,000	126,000	0	0	0	7,938,000	82,584
50	2060-32	8,064,000	126,000	0	0	0	8,064,000	83,922
51	2062-33	8,190,000	126,000	0	0	0	8,190,000	85,260
52	2064-34	8,316,000	126,000	0	0	0	8,316,000	86,598
53	2066-35	8,442,000	126,000	0	0	0	8,442,000	87,936
54	2068-36	8,568,000	126,000	0	0	0	8,568,000	89,274
55	2070-37	8,694,000	126,000	0	0	0	8,694,000	90,612
56	2072-38	8,820,000	126,000	0	0	0	8,820,000	91,950
57	2074-39	8,946,000	126,000	0	0	0	8,946,000	93,288
58	2076-40	9,072,000	126,000	0	0	0	9,072,000	94,626
59	2078-41	9,198,000	126,000	0	0	0	9,198,000	95,964
60	2080-42	9,324,000	126,000	0	0	0	9,324,000	97,302
61	2082-43	9,450,000	126,000	0	0	0	9,450,000	98,640
62	2084-44	9,576,000	126,000	0	0	0	9,576,000	100,000
63	2086-45	9,702,000	126,000	0	0	0	9,702,000	101,360
64	2088-46	9,828,000	126,000	0	0	0	9,828,000	102,720
65	2090-47	9,954,000	126,000	0	0	0	9,954,000	104,080
66	2092-48	10,080,000	126,000	0	0	0	10,080,000	105,440
67	2094-49	10,206,000	126,000	0	0	0	10,206,000	106,800
68	2096-50	10,332,000	126,000	0	0	0	10,332,000	108,160
69	2098-51	10,458,000	126,000	0	0	0	10,458,000	109,520
70	2100-52	10,584,000	126,000	0	0	0	10,584,000	110,880
71	2102-53	10,710,000	126,000	0	0	0	10,710,000	112,240
72	2104-54	10,836,000	126,000	0	0	0	10,836,000	113,600
73	2106-55	10,962,000	126,000	0	0	0	10,962,000	114,960
74	2108-56	11,088,000	126,000	0	0	0	11,088,000	116,320
75	2110-57	11,214,000	126,000	0	0	0	11,214,000	117,680
76	2112-58	11,340,000	126,000	0	0	0	11,340,000	119,040
77	2114-59	11,466,000	126,000	0	0	0	11,466,000	120,400
78	2116-60	11,592,000	126,000	0	0	0	11,592,000	121,760
79	2118-61	11,718,000	126,000	0	0	0	11,718,000	123,120
80	2120-62	11,844,000	126,000	0	0	0	11,844,000	124,480
81	2122-63	11,970,000	126,000	0	0	0	11,970,000	125,840
82	2124-64	12,096,000	126,000	0	0	0	12,096,000	127,200
83	2126-65	12,222,000	126,000	0	0	0	12,222,000	128,560
84	2128-66	12,348,000	126,000	0	0	0	12,348,000	129,920
85	2130-67	12,474,000	126,000	0	0	0	12,474,000	131,280
86	2132-68	12,600,000	126,000	0	0	0	12,600,000	132,640
87	2134-69	12,726,000	126,000	0	0	0	12,726,000	134,000
88	2136-70	12,852,000	126,000	0	0	0	12,852,000	135,360
89	2138-71	12,978,000	126,000	0	0	0	12,978,000	136,720
90	2140-72	13,104,000	126,000	0	0	0	13,104,000	138,080
91	2142-73	13,230,000	126,000	0	0	0	13,230,000	139,440
92	2144-74	13,356,000	126,000	0	0	0	13,356,000	140,800
93	2146-75	13,482,000	126,000	0	0	0	13,482,000	142,160
94	2148-76	13,608,000	126,000	0	0	0	13,608,000	143,520
95	2150-77	13,734,000	126,000	0	0	0	13,734,000	144,880
96	2152-78	13,860,000	126,000	0	0	0	13,860,000	146,240
97	2154-79	13,986,000	126,000	0	0	0	13,986,000	147,600
98	2156-80	14,112,000	126,000	0	0	0	14,112,000	148,960
99	2158-81	14,238,000	126,000	0	0	0	14,238,000	150,320
100	2160-82	14,364,000	126,000	0	0	0	14,364,000	151,680
101	2162-83	14,490,000	126,000	0	0	0	14,490,000	153,040
102	2164-84	14,616,000	126,000	0	0	0	14,616,000	154,400
103	2166-85	14,742,000	126,000	0	0	0	14,742,000	155,760
104	2168-86	14,868,000	126,000	0	0	0	14,868,000	157,120
105	2170-87	14,994,000	126,000	0	0	0	14,994,000	158,480
106	2172-88	15,120,000	126,000	0	0	0	15,120,000	159,840
107	2174-89	15,246,000	126,000	0	0	0	15,246,000	161,200
108	2176-90	15,372,000	126,000	0	0	0	15,372,000	162,560
109	2178-91	15,498,000	126,000	0	0	0	15,498,000	163,920
110	2180-92	15,624,000	126,000	0	0	0	15,624,000	165,280
111	2182-93	15,750,000	126,000	0	0	0	15,750,000	166,640
112	2184-94	15,876,000	126,000	0	0	0	15,876,000	168,000
113	2186-95	16,002,000	126,000	0	0	0	16,002,000	169,360
114	2188-96	16,128,000	126,000	0	0	0	16,128,000	170,720
115	2190-97	16,254,000	126,000	0	0	0	16,254,000	172,080
116	2192-98	16,380,000	126,000	0	0	0	16,380,000	173,440
117	2194-99	16,506,000	126,000	0	0	0	16,506,000	174,800
118	2196-00	16,632,000	126,000	0	0	0	16,632,000	176,160
119	2198-01	16,758,000	126,000	0	0	0	16,758,000	177,520
120	2200-02	16,884,000	126,000	0	0	0	16,884,000	178,880
121	2202-03	17,010,000	126,000	0	0	0	17,010,000	180,240
122	2204-04	17,136,000	126,000	0	0	0	17,136,000	181,600
123	2206-05	17,262,000	126,000	0	0	0	17,262,000	182,960
124	2208-06	17,388,000	126,000	0	0	0	17,388,000	184,320
125	2210-07	17,514,000	126,000	0	0	0	17,514,000	185,680
126	2212-08	17,640,000	126,000	0	0	0	17,640,000	187,040
127	2214-09	17,766,000	126,000	0	0	0	17,766,000	188,400
128	2216-10	17,892,000	126,000	0	0	0	17,892,000	189,760
129	2218-11	18,018,000	126,000	0	0	0	18,018,000	191,120
130	2220-12	18,144,000	126,000	0	0	0	18,144,000	192,480
131	2222-13	18,270,000	126,000	0	0	0	18,270,000	193,840
132	2224-14	18,396,000	126,000	0	0	0	18,396,000	195,200
133	2226-15	18,522,000	126,000	0	0	0	18,522,000	196,560
134	2228-16	18,648,000	126,000	0	0	0	18,648,000	197,920
135	2230-17	18,774,000	126,000	0	0	0	18,774,000	199,280
136	2232-18	18,900,000	126,000	0	0	0	18,900,000	200,640
137	2234-19	19,026,000	126,000	0	0	0	19,026,000	202,000
138	2236-2							

RESPONSES

COMMENTS

PROPERTY TAX INCREMENT PROJECTIONS - EIR PRO-07 (1)

PH TELECOMS ADDRESS - EIR PRO-07 (1)

Year	Fiscal Year	Assessed Value	Percent Increase	Added By New Construction	Adj. for Prior Year	Assessed Value (Current)	Incremental Assessed Value	Estimated Tax Increment	County Levy	Annual Revenue to County	Notes
1	1994-95	3,148,443	42.9%	0	0	3,148,443	42,900	430	0	430	
2	1995-96	3,271,440	44.2%	0	0	3,271,440	127,997	1,372	0	1,372	
3	1996-97	3,411,193	44.3%	0	0	3,411,193	149,750	1,577	0	1,577	
4	1997-98	3,571,165	46.2%	2,141,143	41,137,120	5,712,305	2,571,165	27,432	0	27,432	
5	1998-99	3,751,193	48.2%	3,071,328	42,183,948	6,142,546	2,369,353	25,427	0	25,427	
6	1999-00	3,951,193	50.4%	0	41,204,713	44,155,906	3,004,713	31,083	0	31,083	
7	2000-01	4,171,193	52.6%	0	42,226,990	46,398,183	4,272,000	37,447	0	37,447	
8	2001-02	4,411,193	54.9%	0	43,258,980	48,670,170	4,512,000	39,428	0	39,428	
9	2002-03	4,661,193	57.3%	0	44,290,970	50,952,160	4,752,000	41,409	0	41,409	
10	2003-04	4,921,193	59.8%	0	45,322,960	53,244,150	5,002,000	43,390	0	43,390	
11	2004-05	5,191,193	62.4%	0	46,364,950	55,556,140	5,252,000	45,371	0	45,371	
12	2005-06	5,471,193	65.1%	0	47,416,940	57,888,130	5,512,000	47,352	0	47,352	
13	2006-07	5,761,193	67.9%	0	48,478,930	60,240,120	5,782,000	49,333	0	49,333	
14	2007-08	6,061,193	70.8%	0	49,550,920	62,612,110	6,062,000	51,314	0	51,314	
15	2008-09	6,371,193	73.8%	0	50,632,910	65,004,100	6,372,000	53,295	0	53,295	
16	2009-10	6,691,193	76.9%	0	51,724,900	67,416,090	6,702,000	55,276	0	55,276	
17	2010-11	7,021,193	80.1%	0	52,826,890	70,848,080	7,052,000	57,257	0	57,257	
18	2011-12	7,371,193	83.5%	0	53,938,880	74,300,070	7,372,000	59,238	0	59,238	
19	2012-13	7,731,193	87.0%	0	55,060,870	77,772,060	7,672,000	61,219	0	61,219	
20	2013-14	8,101,193	90.6%	0	56,192,860	81,264,050	8,002,000	63,200	0	63,200	
21	2014-15	8,491,193	94.3%	0	57,334,850	84,776,040	8,352,000	65,181	0	65,181	
22	2015-16	8,901,193	98.1%	0	58,486,840	88,308,030	8,712,000	67,162	0	67,162	
23	2016-17	9,331,193	102.0%	0	59,648,830	91,860,020	9,082,000	69,143	0	69,143	
24	2017-18	9,781,193	106.0%	0	60,820,820	95,432,010	9,462,000	71,124	0	71,124	
25	2018-19	10,251,193	110.1%	0	62,002,810	99,024,000	9,852,000	73,105	0	73,105	
26	2019-20	10,741,193	114.3%	0	63,194,800	102,636,000	10,252,000	75,086	0	75,086	
27	2020-21	11,251,193	118.6%	0	64,396,790	106,268,000	10,662,000	77,067	0	77,067	
28	2021-22	11,781,193	123.1%	0	65,608,780	109,920,000	11,082,000	79,048	0	79,048	
29	2022-23	12,331,193	127.7%	0	66,830,770	113,592,000	11,512,000	81,029	0	81,029	
30	2023-24	12,891,193	132.5%	0	68,062,760	117,284,000	11,952,000	83,010	0	83,010	
31	2024-25	13,461,193	137.4%	0	69,314,750	120,996,000	12,402,000	85,001	0	85,001	
32	2025-26	14,041,193	142.4%	0	70,586,740	124,728,000	12,862,000	87,002	0	87,002	
33	2026-27	14,631,193	147.5%	0	71,878,730	128,480,000	13,332,000	89,003	0	89,003	
34	2027-28	15,231,193	152.7%	0	73,190,720	132,252,000	13,812,000	91,004	0	91,004	
35	2028-29	15,841,193	158.0%	0	74,522,710	136,044,000	14,302,000	93,005	0	93,005	
36	2029-30	16,461,193	163.4%	0	75,874,700	139,856,000	14,802,000	95,006	0	95,006	
37	2030-31	17,091,193	168.9%	0	77,246,690	143,688,000	15,312,000	97,007	0	97,007	
38	2031-32	17,731,193	174.5%	0	78,638,680	147,540,000	15,832,000	99,008	0	99,008	
39	2032-33	18,381,193	180.2%	0	80,050,670	151,412,000	16,362,000	101,009	0	101,009	
40	2033-34	19,041,193	186.0%	0	81,482,660	155,304,000	16,902,000	103,010	0	103,010	
41	2034-35	19,711,193	191.9%	0	82,934,650	159,216,000	17,452,000	105,011	0	105,011	
42	2035-36	20,391,193	197.9%	0	84,406,640	163,148,000	18,012,000	107,012	0	107,012	
43	2036-37	21,081,193	204.0%	0	85,898,630	167,090,000	18,582,000	109,013	0	109,013	
44	2037-38	21,781,193	210.2%	0	87,410,620	171,042,000	19,162,000	111,014	0	111,014	
45	2038-39	22,491,193	216.5%	0	88,942,610	175,004,000	19,752,000	113,015	0	113,015	
46	2039-40	23,211,193	222.9%	0	90,494,600	178,976,000	20,352,000	115,016	0	115,016	
47	2040-41	23,941,193	229.4%	0	92,066,590	182,958,000	20,962,000	117,017	0	117,017	
48	2041-42	24,681,193	236.0%	0	93,658,580	186,950,000	21,582,000	119,018	0	119,018	
49	2042-43	25,431,193	242.7%	0	95,270,570	190,952,000	22,212,000	121,019	0	121,019	
50	2043-44	26,191,193	249.5%	0	96,902,560	194,964,000	22,852,000	123,020	0	123,020	
51	2044-45	26,961,193	256.4%	0	98,554,550	198,986,000	23,502,000	125,021	0	125,021	
52	2045-46	27,741,193	263.4%	0	100,226,540	203,018,000	24,162,000	127,022	0	127,022	
53	2046-47	28,531,193	270.5%	0	101,918,530	207,060,000	24,832,000	129,023	0	129,023	
54	2047-48	29,331,193	277.7%	0	103,630,520	211,112,000	25,512,000	131,024	0	131,024	
55	2048-49	30,141,193	285.0%	0	105,352,510	215,174,000	26,202,000	133,025	0	133,025	
56	2049-50	30,961,193	292.4%	0	107,084,500	219,246,000	26,902,000	135,026	0	135,026	
57	2050-51	31,791,193	299.9%	0	108,836,490	223,328,000	27,612,000	137,027	0	137,027	
58	2051-52	32,631,193	307.5%	0	110,608,480	227,420,000	28,332,000	139,028	0	139,028	
59	2052-53	33,481,193	315.2%	0	112,390,470	231,522,000	29,062,000	141,029	0	141,029	
60	2053-54	34,341,193	323.0%	0	114,182,460	235,634,000	29,802,000	143,030	0	143,030	
61	2054-55	35,211,193	330.9%	0	115,984,450	239,756,000	30,552,000	145,031	0	145,031	
62	2055-56	36,091,193	338.9%	0	117,796,440	243,888,000	31,312,000	147,032	0	147,032	
63	2056-57	36,981,193	347.0%	0	119,618,430	248,030,000	32,082,000	149,033	0	149,033	
64	2057-58	37,881,193	355.2%	0	121,450,420	252,182,000	32,862,000	151,034	0	151,034	
65	2058-59	38,791,193	363.5%	0	123,292,410	256,344,000	33,652,000	153,035	0	153,035	
66	2059-60	39,711,193	371.9%	0	125,144,400	260,516,000	34,452,000	155,036	0	155,036	
67	2060-61	40,641,193	380.4%	0	127,006,390	264,698,000	35,262,000	157,037	0	157,037	
68	2061-62	41,581,193	389.0%	0	128,878,380	268,890,000	36,082,000	159,038	0	159,038	
69	2062-63	42,531,193	397.7%	0	130,760,370	273,092,000	36,912,000	161,039	0	161,039	
70	2063-64	43,491,193	406.5%	0	132,652,360	277,304,000	37,752,000	163,040	0	163,040	
71	2064-65	44,461,193	415.4%	0	134,554,350	281,526,000	38,602,000	165,041	0	165,041	
72	2065-66	45,441,193	424.4%	0	136,466,340	285,758,000	39,462,000	167,042	0	167,042	
73	2066-67	46,431,193	433.5%	0	138,388,330	290,000,000	40,332,000	169,043	0	169,043	
74	2067-68	47,431,193	442.7%	0	140,320,320	294,252,000	41,212,000	171,044	0	171,044	
75	2068-69	48,441,193	452.0%	0	142,262,310	298,514,000	42,102,000	173,045	0	173,045	
76	2069-70	49,461,193	461.4%	0	144,214,300	302,786,000	42,992,000	175,046	0	175,046	
77	2070-71	50,491,193	470.9%	0	146,176,290	307,068,000	43,892,000	177,047	0	177,047	
78	2071-72	51,531,193	480.5%	0	148,148,280	311,360,000	44,802,000	179,048	0	179,048	
79	2072-73	52,581,193	490.2%	0	150,130,270	315,662,000	45,722,000	181,049	0	181,049	
80	2073-74	53,641,193	500.0%	0	152,122,260	320,974,000	46,652,000	183,050	0	183,050	
81	2074-75	54,711,193	510.0%	0	154,124,250	326,296,000	47,592,000	185,051	0	185,051	
82	2075-76	55,791,193	520.1%	0	156,136,240	331,628,000	48,542,000	187,052	0	187,052	
83	2076-77	56,881,193	530.3%	0	158,158,230	336,970,000	49,502,000	189,053	0	189,053	
84	2077-78	57,981,193	540.6%	0	160,190,220	342,322,000	50,472,000	191,054	0	191,054	
85	2078-79	59,091,193	551.0%	0	162,232,210	347,684,000	51,452,000	193,055	0	193,055	
86	2079-80	60,211,193	561.5%	0	164,284,200	353,056,000	52,442,000	195,056	0	195,056	
87	2080-81	61,341,193	572.1%	0	166,346,190	358,438,000	53,442,000	197,057	0	197,057	
88	2081-82	62,481,193	582.9%	0	168,418,180	363,830,000	54,452,000	199,058	0	199,058	
89	2082-83	63,631,193	593.8%	0	170,500,170	369,232,000	55,472,000	201,059	0	201,059	
90	2083-84	64,791,193	604.8%	0	172,592,160	374,644,000	56,502,000	203,060	0	203,060	
91	2084-85	65,961,193	615.9%	0	1						

RESPONSES

COMMENTS

FD TECHNOLOGIES MARKET - 100 PPO-07 (1)
 NO TECHNOLOGIES MARKET - 100 PPO-07 (1)
 RCI/PPS PAID ULTIMATE

Year	Fiscal Year	Revenue	Profit	Revenue Increase	Profit Increase	Revenue at Risk	Profit at Risk	Revenue at Risk	Profit at Risk	Revenue at Risk	Profit at Risk
1	1990-91	3,150,000	176,000	0	0	3,150,000	176,000	3,150,000	176,000	3,150,000	176,000
2	1991-92	3,774,000	131,000	0	0	3,774,000	131,000	3,774,000	131,000	3,774,000	131,000
3	1992-93	3,407,000	134,000	0	0	3,407,000	134,000	3,407,000	134,000	3,407,000	134,000
4	1993-94	3,443,322	161,733	0	13,687,043	3,443,322	161,733	3,443,322	161,733	3,443,322	161,733
5	1994-95	0	0	0	0	0	0	0	0	0	0
6	1995-96	478,893	27,134	0	679,892	478,893	27,134	478,893	27,134	478,893	27,134
7	1996-97	704,028	29,742	0	0	704,028	29,742	704,028	29,742	704,028	29,742
8	1997-98	734,290	29,372	0	0	734,290	29,372	734,290	29,372	734,290	29,372
9	2000-01	743,642	30,154	0	0	743,642	30,154	743,642	30,154	743,642	30,154
10	2001-02	794,208	31,748	0	0	794,208	31,748	794,208	31,748	794,208	31,748
11	2002-03	825,977	33,039	0	0	825,977	33,039	825,977	33,039	825,977	33,039
12	2003-04	839,016	34,361	0	0	839,016	34,361	839,016	34,361	839,016	34,361
13	2004-05	871,919	35,720	0	720,889	871,919	35,720	871,919	35,720	871,919	35,720
14	2005-06	1,451,000	64,800	0	0	1,451,000	64,800	1,451,000	64,800	1,451,000	64,800
15	2006-07	1,790,048	71,602	0	0	1,790,048	71,602	1,790,048	71,602	1,790,048	71,602
16	2007-08	1,841,450	74,044	0	0	1,841,450	74,044	1,841,450	74,044	1,841,450	74,044
17	2008-09	1,956,116	77,643	0	0	1,956,116	77,643	1,956,116	77,643	1,956,116	77,643
18	2009-10	2,013,541	80,542	0	0	2,013,541	80,542	2,013,541	80,542	2,013,541	80,542
19	2010-11	2,094,102	83,744	0	0	2,094,102	83,744	2,094,102	83,744	2,094,102	83,744
20	2011-12	2,171,860	87,194	0	0	2,171,860	87,194	2,171,860	87,194	2,171,860	87,194
21	2012-13	2,244,982	90,119	0	0	2,244,982	90,119	2,244,982	90,119	2,244,982	90,119
22	2013-14	2,311,581	92,223	0	0	2,311,581	92,223	2,311,581	92,223	2,311,581	92,223
23	2014-15	2,449,805	97,892	0	0	2,449,805	97,892	2,449,805	97,892	2,449,805	97,892
24	2015-16	2,547,797	101,912	0	0	2,547,797	101,912	2,547,797	101,912	2,547,797	101,912
25	2016-17	2,649,709	105,968	0	0	2,649,709	105,968	2,649,709	105,968	2,649,709	105,968
26	2017-18	2,731,697	110,228	0	0	2,731,697	110,228	2,731,697	110,228	2,731,697	110,228
27	2018-19	2,843,925	114,637	0	0	2,843,925	114,637	2,843,925	114,637	2,843,925	114,637
28	2019-20	2,976,744	119,222	0	0	2,976,744	119,222	2,976,744	119,222	2,976,744	119,222
29	2020-21	3,096,704	123,791	0	0	3,096,704	123,791	3,096,704	123,791	3,096,704	123,791
30	2021-22	3,223,716	128,433	0	0	3,223,716	128,433	3,223,716	128,433	3,223,716	128,433

Present Value (1991-92 to 2021-22) at 8.33 Discount Rate 183,433
 1) Scripta has stated that these estimates will not be completed for another 10-15 years. Therefore, the revenues from this final phase should not be represented in this model until the year of 2022 to 2027. The revenues from this phase have been adjusted in this model to reflect a completion time to 2024 - 2025.

RESPONSES

COMMENTS

FD-1099-INT INCREASE PROJECTIONS - 610 PRO-07
 PRO TECHNOLOGICAL SERVICES - 610 PRO-07
 (SEE NEW LINES)

Year	Fiscal Year	Income	Percent Increase	Sales Added by New Outlets	Balance for Stimulated Growth	Example	From The Revenue to City of St
(1)	1990-91	3,116,000	124,000	0	0	3,116,000	32,760
1	1991-92	3,278,000	311,000	0	0	3,278,000	34,070
2	1992-93	3,407,000	334,282	0	0	3,407,000	35,833
3	1993-94	3,543,322	353,723	4,687,070	(3,482,053)	4,643,322	48,481
4	1994-95	3,687,070	378,443	0	0	4,627,513	48,175
5	1995-96	3,841,414	403,347	0	0	5,061,414	50,034
6	1996-97	4,006,793	428,379	0	0	5,429,070	52,431
7	1997-98	4,183,070	453,276	0	0	5,897,346	54,798
8	1998-99	4,370,409	478,339	0	0	6,375,785	57,237
9	2000-01	4,567,743	503,370	0	0	6,864,155	59,747
10	2001-02	4,774,076	528,334	0	0	7,362,525	62,322
11	2002-03	4,989,409	553,337	0	0	7,870,895	64,957
12	2003-04	5,214,742	578,330	0	0	8,389,265	67,652
13	2004-05	5,450,075	603,323	0	0	8,917,635	70,407
14	2005-06	5,695,408	628,316	0	0	9,456,005	73,222
15	2006-07	5,950,741	653,309	0	0	10,004,375	76,097
16	2007-08	6,216,074	678,302	0	0	10,562,745	79,032
17	2008-09	6,491,407	703,295	0	0	11,131,115	82,027
18	2009-10	6,776,740	728,288	0	0	11,710,485	85,082
19	2010-11	7,072,073	753,281	0	0	12,300,855	88,197
20	2011-12	7,377,406	778,274	0	0	12,902,225	91,372
21	2012-13	7,692,739	803,267	0	0	13,514,595	94,607
22	2013-14	8,018,072	828,260	0	0	14,137,965	97,902
23	2014-15	8,353,405	853,253	0	0	14,772,335	101,257
24	2015-16	8,698,738	878,246	0	0	15,417,705	104,672
25	2016-17	9,054,071	903,239	0	0	16,074,075	108,147
26	2017-18	9,419,404	928,232	0	0	16,741,445	111,682
27	2018-19	9,794,737	953,225	0	0	17,419,815	115,277
28	2019-20	10,180,070	978,218	0	0	18,109,185	118,932
29	2020-21	10,575,403	1,003,211	0	0	18,809,555	122,647
30	2021-22	10,980,736	1,028,204	0	0	19,520,925	126,422

Present Value (1991-92 to 2021-22) at 8.33 Discount Rate 650,130

1) The listing of the sales tax revenues should be shifted back one year to be consistent with the changes in the listing of property tax revenue model.

COMMENTS

RESPONSES

66.



BOARD OF EDUCATION
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LUCAS WORTH, VICE PRES.
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CHIEF & SINDOVAL

SUPERINTENDENT
JOHN WORTH, PhD

CHULA VISTA ELEMENTARY SCHOOL DISTRICT

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EACH CHILD IS AN INDIVIDUAL OF GREAT WORTH

RECEIVED

AUG 26 1991

PLANNING

AUGUST 20, 1991

Ms. Maryann Miller
Environmental Review Section
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

RE: Comments on Recirculated Draft EIR - Scripps Hospital Expansion

Dear Ms. Miller:

Thank you for the opportunity to review and comment on the recirculated Draft EIR for the Scripps Memorial Hospital Expansion.

Section 4.9 Public Facilities/Services, of the DEIR, does not respond to comments previously submitted by the District (see enclosed April 4, 1991, letter). On page 120, mention is made of indirect impacts the project will have on student generation. The District, as the agency responsible for providing elementary education to all children in Chula Vista, quantified these impacts, and this data should be presented in the DEIR. Instead of identifying potential impacts on schools, Section 4.9.2, on pages 122 - 23, seeks to justify payment of developer fees by stating no quasi-legislative action is required of the City. Regardless of whether the City's approval requires a legislative act, payment of fees provides approximately one-fourth of facilities costs, leaving a significant impact unmitigated. A full analysis of potential impacts on schools should be prepared and incorporated into Section 4.9.2, and the appropriateness and adequacy of developer fees discussed under Section 4.9.3, Mitigation Measures.

As stated previously, this project will have significant adverse impacts on school facilities by creating approximately 2,000 new jobs which will generate approximately 147 new elementary students. Existing facilities cannot serve these new students, and the DEIR

As stated on page 128 of the EIR, an estimate of 480 new jobs has been determined to be generated by the proposed project. This information was obtained from an economic analysis prepared for the proposed project by Dr. Jun Onaka of P&D Technologies. A personal communication with Kate Shurson, Director of Planning for the Chula Vista Elementary School District, was made on July 28, 1991. The 480 employee generation information was discussed, and using a generation factor established by the Chula Vista Elementary School District, it was determined that 80 new elementary school children could be generated from the project. This is less than 25 percent of the 347 students that were anticipated by the Chula Vista Elementary School District in their letter(s) dated August 20, 1991, April 4, 1991 and August 14, 1990. As stated in the April 4, 1991 letter, it is not possible to predict where in the District these new students will live, or the specific schools that will be affected. It is assumed that the 80 students would be dispersed among the 32 elementary schools within the District. This is considering a "worst case scenario" that all 80 students would attend an elementary school within the Chula Vista Elementary School District. This would translate to approximately 2.5 additional children per elementary school indirectly generated from the project. With Scripps Memorial Hospital paying development fees of \$0.25 per square foot of development, approximately \$45,000 will be collected with Phase I of the project in school fees. The 80 students generated from the project assumes buildout of the project which is 10-15 years in the future. The measures identified in the EIR are considered adequate to mitigate impacts to the Chula Vista Elementary School District.

66

RESPONSES

COMMENTS

August 20, 1981
Ms. Kyrinn Miller
Re: Rearticulated Draft EIR - Scripps Hospital Expansion

should identify these impacts. Should the City recommend payment of fees as mitigation, given the inadequacy described above, a finding of overriding considerations would seem appropriate. As currently presented, the DEIR does not adequately address impacts on school facilities.

If you have any questions, please call.

Sincerely,

Kate Shurson
Kate Shurson
Director of Planning

K51dP

cc: George Krampf
John Linn



OFFICE OF EDUCATION
 110 CLAYTON BLVD
 CHULA VISTA, CALIFORNIA 92010
 TEL: 619-594-1100
 FAX: 619-594-1101

COMMENTS
CHULA VISTA ELEMENTARY SCHOOL DISTRICT

54 EAST "J" STREET • CHULA VISTA, CALIFORNIA 92010 • 619 621-8000

EACH CHILD IS AN INDIVIDUAL OF GREAT WORTH!

April 4, 1991

Members of the Planning Commission
 City of Chula Vista
 276 Fourth Avenue
 Chula Vista, CA 91010

RE: scripps Hospital Expansion Draft EIR No. 90-07

Dear Commissioners:

The Chula Vista Elementary School District has serious concerns over the impacts non-residential development has had and will have on District enrollments. Particularly in the school's overcrowded elementary schools, the impact of job loss, increased causes of population growth, and with population growth come additional elementary age children.

Since the Notice of Initial Study for the Scripps Hospital expansion was circulated in January, 1990, the Chula Vista Elementary School District has responded to all City notices and project information by documenting impacts on school facilities and recommending an alternative financing mechanism, such as participation in a Mello-Roos community facilities District (CFD). The project requires approval of the Lead Agency for preparation of this Draft EIR, the Chula Vista Hospital expansion, based on inadequacy of school facilities to serve the project, or condition the project to recent court decisions (Mira and Hart Union School District) have upheld this ability when the approval required by a City or County involves a legislative action, such as a general plan amendment or rezoning.

The Draft EIR prepared for the Scripps Hospital expansion fails to respond to impacts on school facilities identified by the District, does not include district data on projected enrollment, District information on District schools, and disallows District information on the Draft EIR. The proposed project would be subject to the Draft EIR school district State mandated development fee for non-residential projects. Impacts to the Chula Vista Elementary School District with project implementation would be fully mitigated by these mandated fees. This statement is false. The Draft EIR does not adequately respond to the finding of potentially significant school impacts identified in the Initial Study.

On numerous occasions, the City has expressed the desire to assist the District to the extent legally possible, in obtaining adequate mitigation for impacts on school facilities. Staff recently proposed the following language for inclusion in the modifying district for properties being rezoned in Area B-1 of Central Chula Vista: "The City of Chula Vista shall contribute a share of the expenses of the Chula Vista Elementary School District and the Chula Vista High School District to mitigate impacts on school facilities." We fully support this language and ask that it be applied to all City actions. For legislative acts, such as the Scripps project, we have the legal authority to require adequate mitigation. The City has the legal mechanism it needs to assist the District. We ask that our mitigation recommendations be implemented.

RESPONSES

67.

As stated in the DEIR on page 122-123, it has been determined that the proposed project is not considered a legislative action because the project does not require a rezone or plan amendment. Instead, the project is considered a development project and Government Code Sections 53080, 65995 and 65996 would be applicable for contribution of school facilities with project implementation. The maximum fee established by these codes is \$0.25/square foot.

68.

Please refer to responses to Comment #s 66 and 67.

RESPONSES

- 69. Please refer to response to Comment #66.
- 70. Please refer to response to Comment #66.

COMMENTS

School Facility Impacts

On August 14, 1990, the District responded to the first draft EIR on this project by stating that impacts cannot be adequately mitigated by payment of school fees. A copy of that letter is attached as Exhibit A. At that time, but impact analysis was based on 196,496 square feet of residential space. With an additional 124,500 square feet of residential space, proposed new construction totals 320,996 square feet, and impacts to schools would be greater than previously indicated. Over 1,000 new jobs/employees are projected for this project, 1,117 new elementary students households in Chula Vista and 1,117 new elementary students will need to be served by the District. It is not possible to predict where in the District these new residents will live, or the specific schools that will be affected. However, virtually all schools west of I-805 are severely overcrowded, creating at or above permanent capacity. District-wide, there is little available capacity. Several hundred children are being bused to various schools when capacity does not have space in grade levels to accommodate all family members. The opening of Clear View School in September, 1991, will provide temporary relief on a District-wide basis, and it is likely that many children from western Chula Vista will be bused to this school. However, as that area develops, Clear View School will be needed to serve neighborhood children.

The data utilized above to calculate employee/student impacts is a study prepared for the District by SANDAG which was recognized by the Legislature through AB 510 as the basis upon which commercial/industrial employee estimates are calculated. While a proportion of growth from new jobs contributes to mitigating impacts on schools through new residential fees, not all new residents live in new housing, and only new housing within a CSD contributes 100% of new facilities costs. Residential development result areas with little or no residential development result from families doubling up, formation of multi-generational households, and neighborhood recycling. Further, the Education Code requires school districts to accept students residing outside the District if a parent is employed within the District. Chula Vista Elementary School District has over 750 inter-district transfers attending our schools.

RESPONSES

71. Please refer to response to Comment #'s 66 and 67.

The measures stated in this comment ".... (1) purchase of district property located on Chula Vista Junior High School; (2) the southerly expansion of the Chula Vista Junior High School's southern boundary; and (3) the provision of storm drain improvements on the campus and the district's ability to construct ten relocatable classrooms on site." have been included as features of the proposed project and are described in Section 4.1, Land Use/Community Character and Section 4.9, Public Facilities/Services. The exchange between the junior high school and the hospital was established in the early development of the project and is considered a mutual benefit. Because these features were included in the project description, they were not considered mitigation measures in the DEIR. Payment of developer fees will mitigate impacts to the Sweetwater Union High School District. See Comment #79 for further confirmation.

73. As discussed in response to Comment #s 66 and 67, adequate mitigation as discussed in the DEIR has been provided for impacts to the school district.

COMMENTS

Mitigation in recognition of the difficulties in calculating percentages of new admissions who will contribute to school mitigation via new housing/CRP's, the District's annual CRF No. 5 apportionment contributions between residential and non-residential development based on the same formula used by the State in authorizing developer fees. Specifically authorized developer fees, which provide approximately 1/3 of residential fees. Similarly, the taxing formula for CRF No. 5 assesses non-residential development at the rate of 16.67% of the \$.154/square foot base rate, with a single family residential development assessed at 100% of the base rate. Taxes commence at the time building permits are issued, are collected for twenty-five years, and the District is able to bond against future revenues in order to finance facilities at the time of need.

Based on the impacts implementation of the Scripps Hospital expansion will have on District facilities, it is recommended that annexation to CRF No. 5, be a condition of project approval. Assuming project buildout of 510,368 square feet, the first year's assessment would be approximately \$13,350. By annexing to CRF No. 5, Scripps Hospital project will contribute 16.67% of the total costs needed to house students estimated to be generated as a result of project implementation.

The Draft EIR does not discuss impacts or mitigation for the Sweetwater Union High School District. According to correspondence from Sweetwater, in a separate agreement, Scripps and Sweetwater agreed to an alternative mitigation measure, which includes ".... (1) the purchase of district property located on Chula Vista Junior High School; 2) the southerly expansion of the Chula Vista Junior High School's southern boundary; and 3) the provision of storm drain improvements on the campus and the district ability to construct relocatable classrooms on site." It is assumed developer fees will also be collected by the District. Copies of Sweetwater's correspondence to the city are attached as Exhibit B.

There have been no discussions between the Chula Vista Elementary School District and Scripps relative to an agreement for mitigation of impacts to elementary schools. To assure that this will occur, City condition project mitigation, we request that the City condition project approval of the Scripps Hospital to include participation in the District's CRF No. 5. Absent implementation of this condition by the City, the District's overcrowded facilities will be further strained and our ability to accommodate new children resulting from implementation of this project will be severely affected.

The City's cooperation with our efforts to assure elementary facilities are available to serve all children in Chula Vista is essential to our success. The City's next step in this direction by adopting the proposed standard for Schools. In order to attain that standard, all development, including non-residential, must pay its fair share toward providing school facilities.

Thank you for the opportunity to comment on the Draft EIR. Please feel free to contact me if you have any questions or if I can provide additional information.

Sincerely,

Kate Shuman
Kate Shuman
Director of Planning

KG:dp
cc: John Ocas
George Kraspl
Chris Williams
Jack Matlock
John Lion

RESPONSES

COMMENTS

79. Please see response to Comment #72.



Sweetwater Union High School District

ADMINISTRATION CENTER
180 CHINA AVENUE
CHULA VISTA, CA 91910-2000

Division of Planning and Facilities

September 13, 1991

Ms. Mary Ann Miller
City of Chula Vista
Community Development
Department
276 Fourth Avenue
Chula Vista, CA 91910

Dear Ms. Miller:

Re: Scripps Memorial Hospital Expansion Project
Recirculated Draft E.I.R. (E.I.R. 90-07)
Sch # 90010569

I am in receipt of the above subject draft Environmental Impact Report and appreciate the opportunity to provide comments on behalf of the Sweetwater Union High School District. The report accurately addresses this project's relationship to school impacts. It is true that as employment opportunities become available in the South Bay region, additional students will enter the district by way of new households.

It is anticipated that this project will add employment opportunities to the region. However, with regard to the project, page 124 of the document only partially lists adequate mitigation measures. The payment of fees in accordance with Education Code Section 53000 is acceptable to the district. Unfortunately, the report does not state an agreed upon solution to the problem cumulative development of this area has placed upon the adjacent junior high school. The City Community Development Department, Scripps Memorial Hospital and the Sweetwater Union High School District have agreed that, with respect to this project, the following off-site improvements will occur:

RESPONSES

COMMENTS

1. The heading to the district, property identified in figures 4 and 13 of the document to facilitate the construction of future classrooms, and a common driveway from Fifth Avenue to the rear portion of Chula Vista Junior High School to allow emergency vehicular access to the school.
2. The provision of an underground storm drain which will correct the flooding that Chula Vista Junior High School experiences due to the day lighting of a large storm drain near the Bay Medical Plaza. The City has allowed this condition to occur when approving previous development applications.

3. At the request of the City Engineering Department and Scripps Hospital, the district has agreed to provide a thirty foot right-of-way from the Chula Vista Junior High School campus located at the southeast corner of "a" street. The provision of this right-of-way would be contingent upon the sale of the school's handball court located at the eastern edge of the campus.

I have enclosed two documents which staff has sent to the City requesting that the Environmental Impact Report address the issues described above. I am requesting that these issues be stated in the report. Additionally, they could be implemented via a development agreement between the district and the applicant.

It should be noted that Chula Vista Junior High School is a part of the Town Center II Redevelopment area, and the improvements to the campus will definitely enhance the downtown area. If you require additional information, or have any questions regarding this correspondence, please feel free to call me at 619-553-5553.

Sincerely,



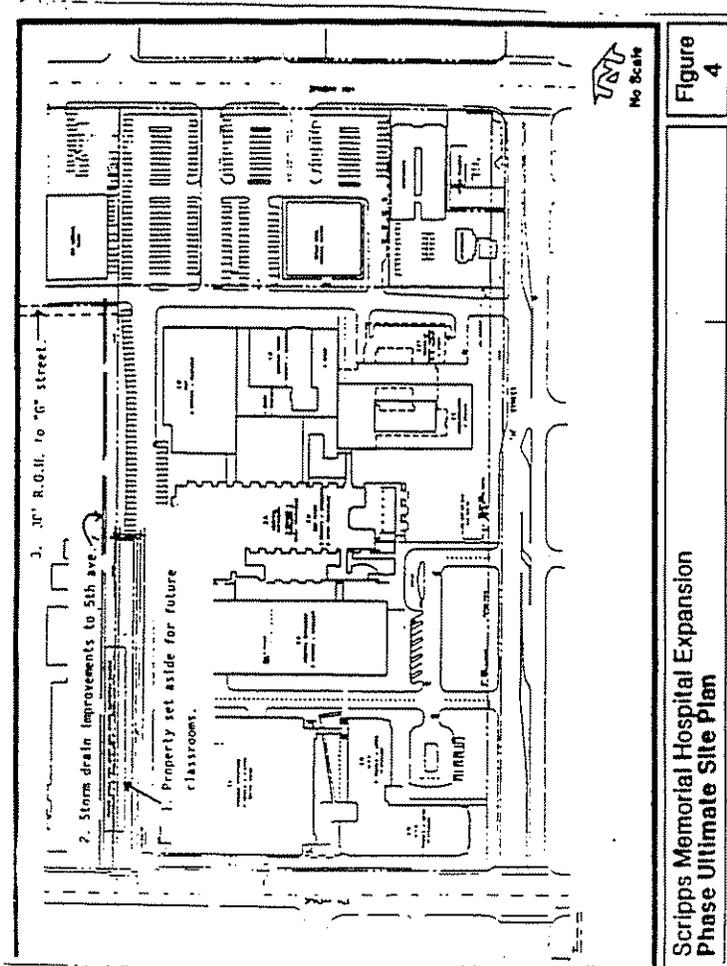
Thomas Elivo
Assistant Director of Planning

TS/mi

cc: Ms. Kate Shuron, Chula Vista City Schools
Mr. Robert Letter, City of Chula Vista
Enclosures

COMMENTS

RESPONSES



RESPONSES

COMMENTS

80. Please see response to Comment #72.

Sweetwater Union High School District

ADMINISTRATIVE CENTER
1150 FORTY-NINTH AVENUE
CHULA VISTA, CALIFORNIA 92011
(619) 591-3300

DATE: FEB 19 1991

TIME: 10:00 AM

PLANNING DEPARTMENT

PLANNING DEPARTMENT

February 12, 1991

Mr. Robert Letter
Director of Planning
City of Chula Vista
278 Fourth Avenue
Chula Vista, CA 91911

Dear Mr. Letter:

Re: Rojo Office Complex/Scrapps Memorial Hospital Expansion

On January 30, 1991, I met with you and George Krempf to discuss future development projects and their potential mitigation of school impacts. Two specific projects were discussed at length: the Rojo office complex and the Scrapps Memorial Hospital projects. You had mentioned that a public hearing was scheduled for February 14, 1991.

Rojo Office Complex:

The employment opportunities offered by the addition of a 245,000 square-foot office building could significantly impact Sweetwater's schools. As stated in prior correspondences from this office, these impacts could be mitigated by the project's annexation to Community Facilities District No. 6 (CFD No. 5).

Scrapps Memorial Hospital Expansion:

On June 4, 1990, Mr. Campbell, administrator of planning, sent a letter responding to the Notice of Preparation of Draft Environmental Impact Report requesting that the project be annexed to Community Facilities District No. 5. As I stated in one meeting, annexation to CFD No. 5 is not necessary because the applicant agreed to an alternative mitigation measure which was found to be acceptable by the district. The solution includes: 1) the project be annexed to Community Facilities District No. 6 (CFD No. 5); 2) the provision of the Chula Vista Junior High School, southern boundary, and 3) the provision of storm drain relocation classrooms on site. This solution and the payment of school fees adequately mitigates the projects' impact to the district.

Should you require additional information, please call me.

Sincerely,

Thomas Silve
Thomas Silve
Director of Planning

TS/sf
cc: James Leary
Kate Shurson.

RESPONSES

81. The comment is noted. Please see response to Comment #72.

82. Please see Comment #80 as stated in the February 12, 1991 letter from the Sweetwater Union High School District to the City of Chula Vista.

COMMENTS

Sweetwater Union High School District

ADMINISTRATION CENTER
1150 FIFTH AVENUE
CHULA VISTA, CALIF. 92011

EXHIBIT B - Page 2

DEPARTMENT

JUN 7 1990

June 4, 1990

Mr. Robert Laichter
Planning Director
City of Chula Vista
278 Fourth Avenue
Chula Vista, CA 92010

Dear Mr. Laichter:
Re: Notice of Preparation of an Environmental Impact Report
EIR-90-07

The Sweetwater Union High School District is in receipt of your May 29, 1990, Notice of Preparation of an Environmental Impact Report, and as a responsible agency we would like to respond to the following areas of concern:

1. LAND USE

The following three areas have been discussed with the hospital regarding the expansion:

a. The deed of property to the Sweetwater Union High School District of property as identified in Exhibit B in order to facilitate the construction of future classrooms. The hospital has agreed to provide a common driveway with access from Fifth Avenue to provide District vehicular access to the rear portion of the school. This rear access is required by the City of Chula Vista's Fire Marshal.

81

b. During previous developments, a large storm drain was constructed from Fourth Avenue to the southeast corner of the hospital site. The current effect of this drainage is to flood both the athletic and classroom areas of the Junior High school. To mitigate this impact, this drain needs to be ducted into the hospital's proposed storm drain system.

c. At the request of the City of Chula Vista and Scripps Hospitals, the District has agreed to provide a thirty foot right-of-way from the Chula Vista Junior High School Campus southeast corner to "G" Street. This right-of-way needs to be shielded in order to provide visibility to eye contact with the athletic field. This provision of right-of-way availability is contingent upon the District's sale of its current handball court area (approximately 22,000 square feet).

2. Development Impact of Enrollment

The construction of approximately 521,000 square foot calculates into 312 new students. This will need to be mitigated prior to the issuance of the building permit and construction. This can be potentially mitigated by inclusion into our Community Facilities District No. 5.

82

Sincerely,

Andrew P. Campbell
Andrew P. Campbell
Administrator of Planning

ABC/ler

COMMENTS



ENTRANCO • FEDERHART

TRAFFIC ENGINEERING
200 CONGRESS STREET, SUITE 200
SANTA ANA, CALIFORNIA 92701
TEL. (714) 294-9813

September 23, 1991
Project No. 9160

Ms. Maryann Miller
Environmental Review Coordinator
CITY OF ORLA VISTA
276 4th Ave.
Orla Vista, CA 91910

RE: REVIEW OF SCRIPPS MEMORIAL HOSPITAL EXPANSION PROJECT EIR
(EIR 90-07, SCH # 90010569), CITY OF ORLA VISTA

Dear Ms. Miller:

ENTRANCO/Federhart has been asked to review the technical documentation involving traffic and circulation for the Scripps Memorial Hospital Expansion EIR on behalf of the Circanis Corporation. As a result, we have identified the following concerns. These issues have been verbally communicated to both Dadek & Associates and Willdon & Associates as of this date. They are preparers of the documentation.

Specifically,

1. The traffic study in the Appendix (App-B, page 14, table 3) identifies 37,000 sq. ft. of "storage" use in Phase II. We observe that the project description in the resubmitted draft EIR of August 8, 1991 (page 24 - 32) does not mention this use. If this area is part of another hospital-related activity, we believe a more appropriate technique would be to include it within the square footage total for that primary use. Doing this could result in an increase in trip making.
2. Within the same referred sections, above, the EIR defines an 84,560 sq. ft. "diagnostic" center which is not included in the calculations for generated traffic in the traffic study. A substantial amount of traffic could be expected to be associated with such a facility.
3. Although using the number of "beds" as the basis for generating traffic for the hospital is one of the recognized ways of calculating traffic for a hospital, it is the least conservative method for this project. Much of the hospital expansion consists of adding floor area but not many beds proportionally. A more conservative technique would be to use the floor area-based trip rates rather than the per bed rates (page 14, table 3).

Based upon our review on the above issues, we recommend that additional technical work be undertaken to resolve the issues described herein.

Sincerely,

Arnold Torrea, T.E.
Senior Traffic Engineer

RESPONSES

- 83.** Please refer to Comment #36 for clarification of the facilities and uses that were used for the traffic generation data for the project. As stated in the response to Comment #36, the project characteristics described in the FEIR have been modified to include the 37,000 square feet of office space and 37,000 square feet of storage space.
- 84.** Please refer to response to Comment #36 for clarification of the facilities and uses that were used for traffic generation data for the project. As shown on the table in response to Comment #36, the 84,560 square foot diagnostic center was included in the ultimate expansion of the hospital. Traffic generation for the ultimate expansion of the hospital including the diagnostic center is included in the hospital bed rate (257 beds).
- 85.** Please refer to response to Comment #36 and response to Comment #93. Trip generation rates used in the Scripps Memorial Hospital Expansion traffic analysis are consistent with trip generation rates published by SANDAG in their January 1990 Traffic Generators manual.

COMMENTS

Manojj-Lopez, Engineering
civil engineering * traffic & transportation * parking design

September 20, 1991

Environmental Review Coordinator
Chula Vista Planning Commission

COMMENTS ON THE SCRIPPS HOSPITAL EXPANSION PROJECT
basic deficiencies in the (EIR 90-07)

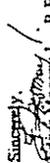
Attention: Maryann Müller

I prepared a letter to Wayne Weverka dated April 16, 1991, which I understood was submitted to the Planning Commission for consideration. That letter noted deficiencies, basic deficiencies, in the traffic study which needed correction so that decision makers could have complete and accurate information regarding the traffic impacts of the proposed Scripps Hospital Expansion. In the Recirculated Draft EIR, my letter is not even acknowledged and further the deficiencies have not been corrected.

The projected trip generation is low because the wrong trip generation rates were used. If the proper rates are used for "Office" and "Storage" uses, then a total trip generation of 11,905 daily trips is obtained. The increase is 4091, not 1201 and all the traffic impacts are proportionately greater. The traffic increase would be 52%.

The trip distribution is wrong because the report is saying that 100% of the traffic will use 5th Avenue (coincidentally one street in the project vicinity with unused capacity). It is obvious that much more use will be made of the H Street driveways, they are simply more convenient. Thus, the trip distribution needs to be redone.

The report has a flawed foundation, anything that follows is unsubstantiated. I would very much like to be present at the Hearing to elaborate on my findings but I am a speaker at the Institute of Transportation Engineers Conference in Milwaukee, September 22 - 27.

Sincerely,

Edgard Moore, L., P.E.
Registered Civil Engineer 27188
Registered Traffic Engineer 1432

attachment: Copy of letter submitted on April 16, 1991

16123 Lyons Valley Road * Janol, California 92035 * 619/669-0920

RESPONSES

86. Please refer to the discussion on page 3 of the DEIR. As stated on page 3, the recirculated DEIR responds to various concerns raised by commentators on the prior draft EIR. "Readers are advised that if they feel that any points raised in their earlier comments are not adequately addressed in this recirculated Draft EIR, they must submit these points in a new comment letter before the end of the public comment period. This Recirculated Draft EIR supercedes all previous drafts."

87. As shown on the table in response to Comment #36, the office and storage uses will be created in Phase Ultimate when a portion of the existing hospital is converted to these uses. The City Traffic Engineer has determined that these uses as well as the trip generation rates used for these uses are correct. Furthermore, as stated in response to Comment #93, the trip generation rates for this project are consistent with trip generation rates published by SANDAG in their January 1990 Traffic Generators manual.

88. Please refer to response to Comment #91. Figure 8 of the traffic report illustrates the trip distribution data. From this table, it is illustrated that an assumption was not made that 100% of the traffic would use 5th Avenue.

89. According to the City Traffic Engineer, the traffic report is not flawed. Basic assumptions regarding traffic distribution, traffic generation rates and land uses have been reviewed by both the traffic consultant as well as the City Traffic Engineer and have been determined to be correct assumptions.

COMMENTS

RESPONSES

90.

As indicated in the NOP, the ten signalized intersections were analyzed, however, the four closest intersections to the project site were deemed impacted by the project and those were analyzed. This was jointly decided by the consultant and the City Traffic Engineer.

April 16, 1991

Wayne Wendke
CIRCINUS CORPORATION
P.O. Box 883
Rancho Santa Fe, CA 92067

Review of the Scripps Memorial Hospital Expansion Project EIR

Dear Mr. Wendke,

I have reviewed the Draft EIR for the Scripps Memorial Hospital Expansion Project and found that the Traffic section is inadequate because it does not comply with the Notice of Preparation. Further, the Conclusions and Impacts are based on inaccurate trip distribution and trip generation data. Thus, the Traffic Study and the EIR need to be expanded and redone with correct trip distribution and trip generation data.

COMPLIANCE WITH THE NOTICE OF PREPARATION

Upon first reading the Traffic section I wondered why the study focused on intersections that are obviously not "critical"; of the four intersections analyzed only 4th Avenue at H Street is a congested intersection. However, the Notice of Preparation dated May 29, 1990, listed intersections and road segments that are of concern. All the intersections below should be analyzed especially the ones at the I-5 ramps. The scope of work for the traffic analysis included the following:

ROAD SEGMENTS

H Street
F Street
G Street
Broadway
Fifth Avenue
Fourth Avenue
Third Avenue

INTERSECTIONS

H Street/I-5 Ramps
H Street/Fourth Avenue
H Street/Third Avenue
H Street/I-805 Ramps
F Street/Broadway
F Street/Fifth Avenue
G Street/Fifth Avenue
G Street/Fourth Avenue

The scope of work also states, "Specifically, pertinent safety and accident related data on existing roadway segments in the project vicinity will be analyzed". This was not complied with.

16123 Lyons Valley Road ~ Jernu!, CA 91935 ~ 619/669-0928

Lizmary-López Encarnación
Civil Engineering - Traffic & Transportation - parking design

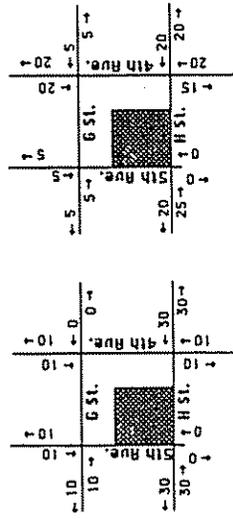
90

COMMENTS

Monroy Lopez Engineering
civil engineering - traffic & transportation - parking design

INCORRECT TRIP DISTRIBUTION DATA

Page 12 of the Traffic Study states that the basis for the trip distribution and assignment was the existing turning movements counts. However, a breakdown by approach of the existing PM Peak Hour counts shown on Figure 6 shows a different trip distribution, see below:



91

WILLDAN DISTRIBUTION DISTRIBUTION BASED ON COUNTS

Because of the proposed median on H Street it would be very helpful to see all the trips assigned to the project driveways. Some proposed trip assignments might not be physically possible.

92

INCORRECT TRIP GENERATION DATA

In determining Trip Generation rates for a Medical Office all the square footage within the project is used. Thus, it is inappropriate to separate Office and Storage areas as though they were unrelated to the Scripps project. In other words, the Storage rate is meant for rental self-storage businesses and the 25 times greater rate of 50 trips per 1000sf should be used.

93

Similarly, the Office rate is meant for commercial offices. Since the proposed office space is a part of the Scripps Memorial Hospital Expansion project, it should have the Medical Office trip generation rates applied to it. The Medical Office rate is 2.5 times greater than that for Office uses

16123 Lyons Valley Road • Jernol, CA 91935 • 619/669-0928

RESPONSES

91.

As indicated in the traffic report, the trip distribution was based on existing intersection counts, however, the trip distribution was modified slightly from existing intersection counts to account for the regional trip distribution the proposed project may have.

92.

Although a graphic illustrating trip assignments to driveways would be a benefit, it is not essential to assess traffic impacts of the project and would not change the outcome of the traffic analysis.

93.

Trip generation rates used in the Scripps Memorial Hospital expansion traffic analysis were consistent with trip generation rates published by SANDAG in their January 1990 Traffic Generators manual. The specific breakdown of land uses within the project site were supplied by the project applicant and substantiated by documentation and trip generation surveys taken at other Scripps Hospital facilities within the County of San Diego. Trip generation assumptions were reviewed and approved by the Chula Vista traffic engineer. Since specific documented trip generation data was available from other Scripps Hospital facilities, it was used to supplement the gross trip generation rates available from SANDAG. Use of documented project-specific data, when available, is standard practice in the completion of traffic analyses.

COMMENTS

Monrudy-Lopez, Engineering
civil engineering - traffic & transportation - parking design

It should be noted that it is very difficult to determine exactly what the proposed project entails in terms of additional square footages. It's as though the text in the EIR was written to obfuscate. The square footages used in the Traffic Study are simply shown in the Trip Generation summary (Table 3) without any explanation.

In conclusion, I believe that for the preceding reasons the conclusions in the Traffic Study and the EIR are not substantiated. The Trip Generation and the Trip Distribution are the basis for any Traffic Study. If these two items are incorrect (as in this case) then everything else that follows is invalid. This Traffic Study should be rebone, including the additional analysis of truly critical intersections.

Sincerely,

E. Lopez
Eduardo Lopez, P.E.
R.C.E. 27188, R.T.E. 1432



16123 Lyons Valley Road * Jamul, CA 91935 * 619/669-0928

RESPONSES

94.

In the DEIR, Section 4.3.2, Potential Impacts, an explicit explanation is given regarding the trip generation rates used for the study. Additionally, the traffic analysis, pg. 12, also goes into details regarding trip generation. Please also see response to Comment #36 regarding proposed uses/square footage and traffic generation.

RESPONSES

95.

The comment is noted and has been incorporated into the DEIR. The City Traffic Engineer has prepared a cost estimate of the 2-4 foot widening in Phase I and then widening to a full lane in Phase Ultimate versus widening H Street to a full lane in Phase I. The total cost of widening H Street in two stages, 2 feet initially and then later an additional 12 feet would be \$108,000. The total cost of widening H Street to a total of 14 feet in one stage would be \$78,500, \$29,500 less. Page 138 now reads as follows:

"driveways. Figure 28 depicts the year 1995 AM and PM peak hour turning movements at the respective driveway locations for the project. Table 12 summarizes the level of service for project access locations for the H Street Business Coalition Alternative. As shown on Table 12, it may be concluded that the access driveways proposed by this alternative would function in an efficient manner with the exception of the Redicare driveway to Fifth Avenue operating at Level of Service E during PM peak hour for left turns from the minor approach. It should be noted that southbound left turning vehicles from Fifth Avenue would not have a left turn pocket due to transitioning of the southbound Fifth Avenue left turn pocket at the H Street/Fifth Avenue signalized intersection.

The site plan indicates that the main driveway into the complex from H Street is proposed to contain left turns in and right turns in and out only. The proposed Arby's driveway would be restricted to right turns in and out only due to construction of a median along H Street. All driveways proposed to and from Fifth Avenue are proposed as full access driveways allowing left turns in and out as well as right turns in and out.

It should be noted that potential conflicts may occur at the right turn in and out driveway serving the Arby's restaurant due to close proximity to the Scripps Memorial Hospital Phase I expansion driveway. This could occur when vehicles making right turns out of the hospital driveway and attempt to cross the path of vehicles turning into the Arby's driveway. The problem would not occur if the hospital main driveway on H Street was an entrance driveway only.

COMMENTS

August 15, 1991
File #1E-014

TO: Mary Ann Hillar
VIA: Clifford L. Swanson, Deputy Public Works Director
City Engineer
FROM: Harold Rosenbery, City Traffic Engineer
SUBJECT: Scripps Memorial Hospital Draft EIR

Under the "H" Street Business Coalition Alternative the draft EIR on page 136 states that "the mitigation measure required for this alternative includes widening the north side of "H" Street by two to four feet to accommodate a raised median along "H" Street." It goes on further to state "that a westbound auxiliary lane would facilitate traffic and thereby enhance traffic safety."

95

While it would be possible to widen "H" Street by only two to four feet to accommodate a median, it would not be cost effective to do this since the roadway would have to be widened again in the future to provide for the ultimate six-lane major street west. Also, the minimal two to four feet widening would not solve the right turn access conflict problem that would occur with this project.

For these reasons the mitigation for the Business Coalition alternative should be modified to read as follows:
"In the opinion of the City Traffic Engineer the narrowness of the existing westbound curb line coupled with the existing driveway and proposed main driveway serving the hospital represents a potential traffic safety risk. A westbound auxiliary lane would facilitate traffic movement and access and thereby enhance traffic safety for project and non-project traffic."

Mitigation measures required for this alternative therefore should include widening the north side of "H" Street to provide for a raised auxiliary lane with a curb line that would be parallel to the third westbound lane required to bring "H" Street to its ultimate six-lane cross section."

HR:na
cc: Roger L. Daoust, Senior Civil Engineer
Sair Huhally, Associate Civil Engineer
(HR1) \SCRIPPS.MEX

COMMENTS

RESPONSES

Mitigation measures required for this alternative would include widening the north side of H Street by two to four feet to accommodate a raised median along H Street. It should be noted that the retention of the H Street Business Coalition driveway and the narrowness of the existing westbound curb lane represents a potential safety risk. A westbound auxiliary lane would facilitate traffic movement and thereby enhance traffic safety.

In the opinion of the City Traffic Engineer, the narrowness of the existing westbound curb line coupled with the existing driveway and proposed main driveway serving the hospital represents a potential traffic safety risk. A westbound auxiliary lane would facilitate traffic movement and access and thereby enhance traffic safety for project and non-project traffic.

Mitigation measures required for this alternative therefore should include widening the north side of "H" Street to provide for an interim auxiliary right turn lane that eventually could be utilized for the third westbound lane required to bring "H" Street to its ultimate six-lane cross section.

COMMENTS

RESPONSES

96. The comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

STATE OF CALIFORNIA

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

PETE WILSON, Governor



RECEIVED

SEP 24 1991

PLANNING

SEP 23, 1991
MARYANN HILLER
CITY OF CHULA VISTA
276 4TH AVE
CHULA VISTA, CA 92010
Subject: SCRIPPS MEMORIAL HOSPITAL EXPANSION
SCH # 90010569

Dear MARYANN HILLER:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has charged the agencies that have commented to please advise the Clearinghouse to indicate that your comments have been received. If the comment package is not in order please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

96

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse requirements for draft environmental documents. Comments to the California Environmental Quality Act. Please contact Tom Poltine at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp
Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

COMMENTS

RESPONSES

97.

As stated in Section 4.3, Traffic and Parking, pg. 69, the Notice of Preparation discusses potential impacts on ten signalized intersections in the vicinity of the project including northbound and southbound ramps to I-805 and I-5 located east and west of the project. However, as the project progressed and after several meetings between the traffic consultant and the City traffic engineer regarding potential traffic impacts associated with this project, it was mutually decided that only the four intersections discussed in the traffic section (H and Fifth, H and Fourth, G and Fifth and G and Fourth) would be affected by project implementation and no impacts are expected to occur at I-5 and I-805 as a result of this project.

Business, Transportation and Housing Agency

State of California

Memorandum

To : State Clearinghouse
Attention T. Loftus

Date September 13, 1991
File No. 11-SD-005
P.O. 11-SD-805
7.2

From : DEPARTMENT OF TRANSPORTATION
District 11

Subject: Recirculated DEIR for the Scripps Memorial Hospital Expansion
Project - SCH 900105E2

The May 29, 1990 Notice of Preparation outlined a scope of work for the traffic analysis that included intersection capacity evaluations of the H Street ramps at interchanges 5 and 805. We look forward to the opportunity to review and comment on that missing information. Our contact person for those interchanges is Jim Linthicum, Project Manager, Project Studies "B," (619) 688-6952.

97

Bill Dillon
BILL DILLON, Chief
Planning Studies Branch

COMMENTS

MINUTES OF A SCHEDULED REGULAR MEETING

Resource Conservation Commission
Chula Vista, California

6:00 p.m., September 23, 1991
Monday, September 23, 1991
Conference Room 1
Public Services Building

CALL MEETING TO ORDER: Meeting was called to order at 6:02 p.m. by Chairman Fox. Present: Commissioners Hall, Kracha, Ray and McQuade. Commissioners Chougastian and Johnson arrived at 6:10 and 6:15 p.m. respectively. Staff members present: Doug Reid and Maryann Miller.

APPROVAL OF MINUTES: Minutes of September 9, 1991 were approved with two corrections: Item 3b on Page 2 should list specific names as moving and seconding motion and the "Commissioner" should be deleted from Item 2, 3rd Paragraph as Mr. Kracha was not participating or voting.

NEW BUSINESS:

A. Nominations were opened for Chair. Barbara Hall and John Kracha were nominated with election votes being deferred to end of meeting.

B. Chairman Fox moved Recirculated Draft EIR (EIR 90-07), Scripps Memorial Hospital Expansion to first item of business. Discussions were opened to the public.

1. Wayne Wencke, President of Circinus Corporation, commented that defects were found in the EIR and agreed to be analyzed and fully explored. The defects were as follows: Traffic issue; asbestos issue; redevelopment issues and design/review issues. A better alternative location was suggested by his company.

98

2. Joe Solomon, Attorney representing Circinus Corporation, commented that EIR is flawed with the same above reasons including the economic analysis. Solomon stated there had been a violation of state and local law because Wencke had not been consulted for the project and that Scripps had been chosen too quickly cancelling Wencke's interest. Solomon commented that a letter had been sent to the City asking for an injunction regarding economic.

99

100. James Leary, Architect representing Scripps Memorial Hospital, commented that he was available to answer questions at this meeting.

4. Mike Jacobs, Vice President of Circinus Corporation, commented there were serious traffic flaws in the EIR and economic analysis.

101

RESPONSES

98. The DEIR includes discussion on each of the issues listed in this comment. Comments regarding traffic issues associated with this project have been raised by members of the public and have been responded to in these responses to comments (see responses to Comment #s 83-94). Asbestos issues are discussed in the DEIR on pg. 93. Measures have been included in the DEIR that would mitigate potential impacts if asbestos was found on site. Redevelopment issues and design review issues are also discussed in the DEIR. Without citing specific concerns, it is not possible to respond to this comment at a more detailed level.

99. The comment is noted. Without citing specific concerns, it is not possible to respond to this comment at a more detailed level. As discussed in the Introduction to this FEIR, the economic analysis is completely separate from the EIR and is included for reference purposes only. However, the comments raised on the economic analysis during the public review period by the Circinus Corporation are responded to in Item #s 2 and 3 of Attachment A to these responses.

100. Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

101. Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary. Please refer to Item #s 2 and 3 of Attachment A, responses to economic questions for further discussion of Mr. Jacob's comments.

COMMENTS

RESPONSES

102. Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

Resource Conservation Commission
Page 2

5. It was moved and seconded to rescind the previous recommendation to the Planning Commission to certify the EIR. A motion was made and seconded to sustain any recommendations until all documents distributed by Curcious Corporation at this meeting had been reviewed by the RCC members.

102

B. Discussions were opened on GPA-91-05; PCZ-91-G; Proposal to amend the General Plan and rezone certain territory. Concern was expressed by Barbara Hall on the number of trucks and length of time they were parked alongside road. Also the number of sewer lines are up to capacity and that they should be enlarged now before starting to build roads. A unanimous motion was carried to see adequacy on sewer system. It was also noted that it is the only unzoned area in the city. A motion was passed 6 to 3 that a request be given to City Council to look at zoning.

C. Discussions were held on PCA-91-06; Consideration of an amendment to the Municipal Code. It was expressed by John Ray that because there had not been any complaints, why change it? Discussion followed with a motion being passed 4 to 3 to not consider it amended to the Municipal Code.

D. Commissioner Fox asked for further nominations for Chair. John Krachis withdrew his nomination and Robert Fox declined mentioning he had been Chair for two years and felt he should give someone else a chance. A motion was carried unanimously for Barbara Hall as the new Chair. Further nominations were taken for Vice Chair with John Krachis and John Ray being nominated. John Krachis left the meeting temporarily. Votes were taken with John Ray winning 4 to 2 with John Krachis not present.

STAFF REPORTS: Doug Reid mentioned regular scheduled meetings for October with November and December meeting the first 3 Mondays in each month. He also made a suggestion that food be brought in for the next meeting on October 7 to celebrate the elections of Chair and Vice Chair.

COMMISSIONER'S COMMENTS: Chairman Fox said he is in favor of a Public Hearing on every EIR because it might not be possible to know if there is enough public interest until a public hearing is called. Discussion followed with a motion unanimously passed regarding public hearings on all EIRs.

ADJOURNMENT: Meeting was adjourned by Chairman Fox at 6:50 p.m.

Respectfully submitted,


Karalee Condron

RESPONSES

COMMENTS

MINUTES OF A SCHEDULED REGULAR MEETING

Resource Conservation Commission
Chula Vista, California
Conference Room 2
Public Services Building

6:00 p.m.
Monday, September 9, 1991

CALL MEETING TO ORDER/ROLL CALL:

The meeting was called to order with a quorum at 6:00 p.m. by Chairman Robert Fox. City Environmental Review Coordinator Doug Reid called the roll.

- Present: Commissioners Fox, Hall, Ghougassian, Kracha, McQuade
- Absent: Commissioners Ray and Johnson
- Staff Present: Douglas Reid, Athena Bradley, and MaryAnn Miller

Also in attendance were representatives of Dudeck and Associates.

APPROVAL OF MINUTES:

A motion was made to approve the minutes of the July 22, 1991, as presented. It was seconded and passed. It was clarified that election of officers will be at the next meeting.

1. CHULA VISTA'S CURBSIDE RECYCLING PROGRAM QUARTERLY UPDATE

The report given by Athena Bradley included proposal of a maximum of 10 collectors working in the City so there could be a good monitoring system and yet have open competition. These haulers would be approved by permit. She stressed the need for monitoring and stated in the RFP she would make a set of guidelines and would submit the cost estimation of the hauler and the business would be recommended which would guarantee a price for 1-2 years. Price gouging could be avoided by setting a level of gross receipts. Monitoring would also enable businesses to have the same services. The aim is for a separate program for multi-family dealings with the possible building of a processing facility. With AB 939, the waste must be reduced. Regarding greens recycling, composting sites at the landfill were suggested.

Commissioner Ghougassian and Fox questioned the need for further staff and whether there is justification for charging customers.

Response by Ms. Bradley indicated all monies collected would go back into the recycling program.

Commissioner Ghougassian moved that the Commission consider the matter again and, if need be, come up with a vote on certain issues and submit them to City Council. Jackie McQuade seconded this motion.

COMMENTS

RESPONSES

RCC _____ -2- _____ September 9, 1991

Discussion concerned the constitutionality of monitoring fees. Commissioner Kracha wanted to make note that the RCC has serious questions regarding monitoring.

Response by Ms. Bradley was that only the grant presentation will be brought to Council and the Commission will be given more time to review the document and present written recommendations.

The motion previously made by Commissioner Ghougassian was withdrawn.

2. SCRIPPS EIR (EIR-90-07)

The Scripps EIR report was presented by MaryAnn Miller. Commissioner Kracha abstained from any vote and staff member Reid stepped down because of a conflict of interest. The EIR preparers from Dudeck and Associates were introduced.

Commissioner Hall voiced concern on the "G" Street entrance being used as an emergency entrance because of the noise impact on surrounding residents, though the primary entrance will be on "H" Street.

Commissioner Kracha stressed the strong need for the medical facility of Scripps because of the influx of people at Escondido and felt the approval of the EIR was essential.

Phase 1 of the facility is due to begin in 1992, with 10-15 years for full build-out.

MOTION: Chairman Fox moved that it be recommended to the Planning Commission to certify the restructured draft EIR 90-07 as presented. It was seconded and passed.

MOTION: Commissioner Hall moved to recommend no "G" Street access. Chairman Fox seconded. Discussion included finding of no significant environmental impact, no objection if not used as a regular access for ambulances, but noise accepted as an impact. If safety is involved, the Planning Commission will take that into consideration. Vote on the motion failed on 2-2-1 vote.

3. REVIEW OF NEGATIVE DECLARATIONS:

3a. IS-91-19 - Jogging trail/bicycle path at the west end adjacent to Sweetwater Road and Willow. Staff member Reid recommended that this be adopted as there is no significant impact. It was so moved, seconded and passed.

3b. IS-92-01 - Rancho del Rey - 5 sites designated to have churches or parks. Member Ghougassian moved that findings are of insignificant impact. Member Kracha seconded the motion. Passed.

103.

Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

104.

As stated in the DEIR, Section 4.4, Noise Analysis, no noise impacts are anticipated with emergency vehicles. As stated in this section, only one siren trip per day is expected with operation of the hospital and there are three emergency entrances to the hospital. This would average one siren trip every three days per entrance to the hospital.

105.

Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

106.

Comment is noted. The comment does not address the sufficiency or adequacy of the EIR and no response is necessary.

103

104

105

106

RESPONSES

COMMENTS

RCC -3- September 9, 1991

- 3c. 15-2147 - Chula Vista Women's Club designation as a historical site. Commissioner Ghougassian moved that findings are of insignificant impact. Commissioner Hall seconded. Passed.
- 3d. 15-2148 - Physical extension of 5th Avenue. Discussion presented the need to give some right-of-way dedication on property that has been surfaced and graded. The plan is for the area to be developed for light industrial business. 0.24 acres of wetlands will be restored west of the project. Chairman Fox moved that there were findings of insignificant impact. Member Ghougassian seconded. Passed.

WRITTEN COMMUNICATIONS:

Commissioner Kracha proposed the possibility of getting young people involved in the Commission activities. Discussion resulted in the decision of Chairman Fox to write to Southwestern College and Sweetwater School District to give them possible ideas of offering one unit credit for this type of student participation.

STAFF REPORT:

Douglas Reid reported on the creation of a long range calendar of meetings for the Planning Commission. The expansion of the shopping center will include McEvyns, a parking structure and the theaters. State law now requires public notice regarding EIRs in the paper and sending out notices in a 100' boundary. Council has expanded that to 500' for public hearings for projects up to 5 acres. Radius has been expanded to 1000' for over 5 acres.

COMMISSIONER'S COMMENTS - Election of officers at next meeting.

Commissioner McQuade commented on a parcel of land on First Avenue across from St. John and contiguous with the park and the plan to build three houses there. She felt the Commission should take a strong position on any houses being built there.

Commissioner Ghougassian commented on an empty lot by the KOA park where mobile homes are being dumped. Chairman Fox will put this on next agenda to investigate and in the meantime Commission members can look at the property.

Chairman Fox introduced the new member, Jackie McQuade, who expressed a long time interest in land use.

ADJOURNMENT at 8:40 p.m. to the regular business meeting of September 9, 1991, at 6:00 in Conference Room 2.

occs:ktj

COMMENTS

RESPONSES

DRAFT

MINUTES OF A REGULAR MEETING OF THE TOWN CENTRE PROJECT AREA COMMITTEE OF THE CITY OF CHULA VISTA

September 5, 1991 8:45 A.M.
Council Conference Room City Hall

1. ROLL CALL

Members Present: Chairman Hyde, Members Blakely,
Harper, Hoffman, Mason and Member
Altbaum was represented by Don
Swanson of the Downtown Business
Association.

Members Excused: Members Ohlson and Peter.

Staff Members: Economic Development Manager,
Cheryl Ove; Principal Community
Development Specialist, Pamela
Buchan; Community Development
Specialist, Alisa Duffey Rogers;
Community Development Specialist,
Miguel Tapia

2. Approval of Minutes of August 15, 1991

MSUC (Blakely/Hoffman) to approve the minutes as mailed.

3. Written Communication

A memorandum, addressed to all City Commission and Committee Chairmen, was received from Councilman Len Moore. The message from this memo was to encourage all committees to attempt to involve the youth of the City in activities in which the City is involved. The Chairman noted receipt of the letter. He further indicated to members of the Committee that if in the future there are any matters appropriate for Mr. Moore's suggestions they would be acted upon in a timely fashion.

REDEVELOPMENT BUSINESS

4. Town Manager Status

Community Development Specialist Alisa Duffey Rogers informed the Committee that the Redevelopment Agency had been signed weeks ago. Applications for the Town Manager position have been coming in and the deadline for the applications is September 30.

Member Mason asked who is involved in reviewing the applications. Ms. Duffey Rogers responded that Don Swanson, Michael Steiner and Eddie Chapman from the Downtown Business Association and the

COMMENTS

RESPONSES

DRAFT

Town Centre Project Area Committee Minutes
September 5, 1991
Page 2

representative from the Town Centre Project Area Committee is Jack Blakely. Mr. Swanson indicated that Michael Steiner has now stepped down from the recruitment committee and that Mr. Swanson will now be the chairperson of this committee. Other members will include Marty Altbauer and Eddie Chapman from the Downtown Business Association; Jack Blakely as the representative from the Town Centre Project Area Committee and Ailisa Duffey Rogers, representing the Redevelopment Agency. Don Swanson also explained the selection process for the Town Manager. Chairman Hyde asked how soon the selection process might be completed. Ms. Duffey Rogers said it is hoped that it would be completed by the end of the year.

5. Development Proposal for 264 Landis Avenue

Community Development Specialist, Miguel Tapia, stated that Mr. & Mrs. Plekunik requested to delay the presentation of their project until their architect arrives. Mr. Hyde answered that we would trail item 5.

4. Land Use Permit for bookstore at Park Plaza

Community Development Specialist, Miguel Tapia, briefly described the project. Mr. Cheng proposed to locate an art gallery along with a bookstore in the corner of Park Plaza. Generally, these land use changes will be in the downtown area. However, in this case, Mr. Cheng plans to sell new and used books. The Town Centre Land Use Policy discourages the sale of used merchandise in the downtown area. Staff's recommendation is that the proposal be approved through a land use permit with the condition that the portion of the used books being sold be limited to 50% or less and also that the used books be in good condition.

Chairman Hyde asked Mr. Cheng if he would like to say something to the committee. Mr. Cheng stated that if the project is approved, he would like to encourage good reading and the appreciation of the arts. He also said he would like to sponsor a spelling bee contest and an annual exhibition of student art in the gallery.

Don Swanson asked Mr. Cheng if he felt that the 50% limitation of used books would be a burden. Mr. Cheng responded that he had no way of determining at this point what the market situation is now. Mr. Swanson commented that he would be inclined to ease up on the 50% limitation of used books.

Member Mason asked staff if there is a reason why staff recommends a 50% limitation of used books. Miguel Tapia

RESPONSES

COMMENTS

DRAFT

Town Centre Project Area Committee Minutes
September 5, 1991
Page 3

responded that 50% seems to be an equal distribution of used and new books. Member Mason then asked staff if when Mr. Cheng initially came to the City was he requesting permission for a used bookstore as an art gallery. Mr. Tapia responded that the initial proposal was for an art gallery in conjunction with a bookstore and that during the discussion Mr. Cheng had indicated that he wanted to sell used books. At that time, staff questioned him on the percentage and he indicated to Mr. Tapia that it would be approximately 50/50. It was on the basis of that information that those conditions were imposed.

A motion was made to amend staff's recommendation to increase the percentage of used books that would be allowed to 75%. The motion failed for lack of a second.

MCUC (Mason/Blakely) to recommend to the Agency to approve staff's recommendation to grant a land use permit to Mr. Cheng for an art gallery/bookstore with the conditions that the used books be limited to 50% or less and that the books be in good condition and appearance.

5. Development proposal for 144 Landis Avenue

Community Development Specialist Miguel Tapia introduced proponents of the project, Mr. & Mrs. Plekniuk, their architect, and paralegal. He then proceeded to give a brief overview of the project. The proposed project is on Landis Avenue, south of Davidson Avenue and across from the Surgi-Center. The project consists of a two-story, 7,300-sq. ft. building. The Plekniuk's are planning to locate their classical ballet studio on the second floor and to lease the office space on the first floor. The location of a studio requires the issuance of a land use permit. A land use permit requires an analysis by staff and also permits making some findings as stated in the zoning ordinance and the Redevelopment Plan. These findings are included in the report submitted to the Committee. He also indicated that the Design Review Committee reviewed the project and recommended to the Redevelopment Agency the adoption of the Mitigated Negative Declaration and the approval of the project subject to conditions imposed by the Design Review Committee.

Maria Epley, a paralegal representing Mr. & Mrs. Plekniuk, stated that Mrs. Plekniuk had provided City staff with a schedule of classes which staff had assumed was the schedule she would adhere to in her new location. Once she had in her new location she will need to extend her hours in order to meet her overhead and financial responsibilities. Chairman Hyde asked what kind of

COMMENTS

RESPONSES

DRAFT

Town Centre Project Area Committee Minutes
September 5, 1991
Page 4

hours she is requesting. Ms. Epley stated that Mrs. Pieknik did not feel that any restrictions should be placed on her.

Mrs. Pieknik stated that she had been running the school for 26 years in the same location on Third Avenue. She said that her classes usually run from 4:30 to 8:30 P.M. Her last class is from 7 to 8:30 P.M. She will need to expand her schedule to allow her more time after 8:30 P.M. Chairman Hyde asked if she had a later hour in mind. She responded that she did not have a particular curfew in mind and that usually after 8:30 P.M. the class would be only an exercise class with a very low cassette and the building would be soundproof.

Steve Rossie, the architect on the building, described the construction of the building. He explained that the building would be well insulated.

Mr. Pieknik asked if there was any City ordinance that established a curfew starting at 8:30 P.M. Chairman Hyde stated that there is a curfew for children starting at 10:00 P.M. The noise abatement law is also 10:00 P.M.

Mr. Pieknik asked Miguel Tapia what is the difference between the present location of their dance studio and the new project at 264 Landis Avenue. He went on to state that they are both commercially zoned, they both have multiple residences adjacent to and across the alley in the rear. The new building will be insulated against sound where as the present location is not insulated and they had never had any complaints about noise even after 8:30 P.M. He asked why all the concern about an unrealistic closing time of 8:30 P.M.

Miguel Tapia responded that there are distinct characteristics in both areas. He stated that Third Avenue is zoned as retail commercial and as such it is expected to have more activity and louder activity even at later hours of the day. The proposed project area is zoned for office buildings and the area to the left of the proposed site is zoned residential. Currently, there are several residentially zoned properties in the area. Therefore, certain restrictions would need to be imposed for the protection of the rights of the adjacent property owners.

Mr. Rossie further described the exact location of the dance studio in relation to the residences surrounding the building.

Mrs. Pieknik stated that she had no objection to a curfew if any complaints were received; but, not until such time as complaints are made.

RESPONSES

COMMENTS

DRAFT

Town Centre Project Area Committee Minutes
September 5, 1991
Page 5

Member Mason questioned Mrs. Pieknik as to the limitation of 20 students per class. She said that that was about the standard amount of students she was comfortable with teaching per class. Chairman Hyde also questioned staff on why that number was set as a limit for each class. Miguel answered that one of the reasons is that the building has a capacity to hold many more than 20 students and if there were larger classes then this could have more significant impacts on parking, traffic and noise in the vicinity. Chairman Hyde asked if there were any limitations at their existing facility. Miguel responded that there were none.

Mr. Hugh Christianson, owner of the properties adjacent to the proposed project, spoke in favor of the project. Mr. Christianson's only concern was in regard to the noise in the event that the building changed ownership or type of businesses. He said he would not object to a later curfew limitation for this project.

Miguel Tapia proposed, in view of the concerns that the Pieknik's were having because of the conditions imposed upon them that the conditions being imposed be restricted six months after the studio is set up to see if these conditions are negatively affecting their business.

Mr. & Mrs. Pieknik declined to accept this proposal. Their response was that they would rather have no conditions imposed upon them from the beginning.

Member Blakely asked Mrs. Pieknik how long her classes last. She answered that they are usually 1 1/2 hours long. Member Blakely asked if she would have any objection if the proposal stated that no class could start later than 8:30 P.M. Mrs. Pieknik stated that it would not be satisfactory because occasionally she would need to hold a class later than 8:30 P.M.

Member Blakely said he had a concern regarding the availability of parking in this area and how this project and other future projects planned for this area would pose a greater demand. After some discussion, the Committee agreed to table the discussion on parking until their next meeting.

MSUC (Hyde/Mason) to recommend to the Agency to approve the project with the only condition that the construction of the building include materials which will prevent the projection of sound outside of the building.

RESPONSES

107. Comment is noted. Without more specific details, it is not possible to respond to this comment.

108. Comment is noted. The EIR has been corrected to reflect this comment and page 37 now states:

"serve gas station serving both unleaded gasoline and diesel fuel. Air and water service is also available for a fee.

o Readicare Center: This emergency urgent care center is located just west of the bank building at the intersection of Fifth Avenue and H Street. It is highly visible from both H Street and Fifth Avenue.

o Farrell's Ice Cream Parlor: Farrell's Ice Cream Parlor is located immediately south of the Fiesta Cinema, fronting Fifth Avenue.

Youth-Oriented Facilities

o Fiesta Cinema: This two-screen theater is located in the northwest corner of the site along Fifth Avenue.

o Roller SkateLand: The skating rink is located in the northwest portion of the single story "Chula Vista Indoor Swap Meet" building located in the interior of the site. Hours of operation vary from day to day. The facility is used for private parties Mondays, Tuesdays and Thursdays. Wednesday evenings are reserved for adults only.

Other Uses On-site: A vacant building is located in the western portion of the site between the Readicare Center and the Farrell's Ice Cream Parlor along Fifth Avenue. A Wherehouse Records store once occupied the building but has since relocated in the newly renovated Chula Vista Shopping Center located south of the project site across H Street.

The large single story "Chula Vista Indoor Swap Meet" building which houses Roller Skateland also leases out space to the neighboring Scripps

COMMENTS

DRAFT

Town Centre Project Area Committee Minutes
September 5, 1991
Page 6

4. Review of Draft EIR for Scripps Hospital

Miguel Tapia stated that Maryann Miller, Environmental Consultant for the Planning Department and Fred Kessman, Redevelopment Coordinator, were on hand to answer any questions. Chairman Hyde asked if anyone from the parties concerned with the EIR had any comments. Gail MacLeod representing the H Street Coalition, stated that they do not think the EIR is adequate and that they would be requesting that additional information be included but because of a time element with this meeting they would delay their comment at this time.

Member Mason stated that he had a couple of comments. On page 37 of the EIR, it refers to the Readicare as an emergency medical care center rather than an urgency care center. He feels that looking at it from a liability point of view for the City, it should be corrected to say that it is an urgency care facility.

RESPONSES

Memorial Hospital. The personnel and financing offices as well as a temporary immunization clinic sponsored by Scripps are located within this building. Other than the above described uses, the

109. Although the removal of the Interstate Bank from the site would be considered an inconvenience to those citizens who bank there, the DEIR concludes that it would not be considered an environmental impact to the land use/community character of the site due to the location of similar uses within a one-mile radius of the site.

110. Comment is noted. This sentence has been deleted from page 132 of the EIR as noted below:

Noise

Potential noise impacts associated with the proposed project would be the same under this alternative as under the proposed project with the exception that noise generated by emergency vehicles along G Street would be avoided under this alternative. Due to the intermittent nature of emergency vehicle traffic on G Street, significant noise impacts were not identified for the project's proposal to provide emergency access from G Street.

6.3 H STREET BUSINESS COALITION ALTERNATIVE

This alternative is regarded as a phasing option. Under this alternative, the Arby's Restaurant, First Interstate Bank and the Redicare Center that are currently located on-site would remain with the first phase of the hospital expansion (see Figure 26). The hospital expansion plans would be identical to the proposed project in terms of the additional square footage and facilities to be provided. The configuration of the facilities, particularly the proposed medical office building, would, however, differ from the proposed design. In addition, the entry along H Street would need to be redesigned under this alternative to accommodate retention of Arby's. ~~According to the applicant, the overall design under this alternative would not be as efficient as under the proposed project.~~ This proposal is consistent with the General Plan by retaining commercial uses on-site.

COMMENTS

Member Mason also brought to the attention page 45, second paragraph, which indicates that the displacement of commercial uses would not provide any significant impact. His concern is with regard to Interstate Bank and the fact that there is not another Interstate Bank nearby; the nearest being in downtown San Diego. He believes this would have an impact on the current bank's clients. He also noted that on page 132 where it refers to the H Street Coalition alternative, it states that according to the applicant, overall design of this alternative would not be as efficient as on the proposed project. Member Mason questions whether or not that is a staff recommendation. He feels that this specifically points out that the H Street Coalition does not have the same abilities as the other proponents. He feels that this is a somewhat biased opinion and should be left out.

MSUC (Hyde/Blakey) to forward the EIR to the Planning Commission with comments from the Town Centre Project Area Committee noting the loss of Interstate Bank and the impact on Interstate Bank users in the community and secondly the question of whether or not the Redicare Center is actually a deliverer of emergency services as indicated in the report.

The Committee adjourned at 10:10 A.M. to the next regular meeting of the Town Centre Project Area Committee scheduled for September 19, 1991.

Sylvia Simmons
Recording Secretary

109

110

COMMENTS

RESPONSES

If the H Street Business Coalition site plan (Figure 26) is compared to the Phase I site plan for the proposed project (Figure 3), a number of differences are apparent in the layout of the 8.9-acre expansion area. As shown in Figure 26, the H Street Business Coalition Alternative, a 5-story medical office building is proposed paralleling H Street just north of the Readicare Center and the First Interstate Bank. Phase I of the proposed project (Figure 3) shows a 4-story medical office building located adjacent to 5th Avenue. The location of this 4-story medical office building is important in reducing visual impacts of the project, and arose from prior design review concerns associated with building mass impacts on the existing street scene. At one time, the project proposed a 5-story medical office building with Phase I construction with

COMMENTS

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September 23, 1991

01580.021

VIA FACSIMILE & U.S. MAIL

Ms. Maryann C. Miller
Environmental Review Coordinator
CITY OF CHULA VISTA
278 4TH AVENUE
CHULA VISTA, CA 92010

Re: RTH, Inc. (Chula Vista Redevelopment)
Recirculated Draft Environmental Impact Report
Case No. EIR-90-7

Dear Maryann:

As you know, this office represents RTH, Inc. ("RTH"), the owner and operator of an Arby's Restaurant affected by the subject Scripps Memorial Hospital Expansion Project ("project"). The project will replace eleven commercial uses on an 8.9 acre site included in the amended Towne Centre II Redevelopment Plan ("Plan") referred to as Area Four. The Plan slated Area Four for "retail/commercial" redevelopment. RTH is participating in a coalition redevelopment proposal that provides for a hospital expansion but mitigates against the project displacing all businesses from Area Four--complete business displacement from Area Four violates the Plan.

This letter is intended to comment upon the above-referenced recirculated Draft Environmental Impact Report ("DEIR") for the Chula Vista Planning Commission ("Commission") and the Chula Vista Redevelopment Agency ("Agency").

A. EUDORRY

The DEIR fails to adequately and objectively evaluate the project and project alternatives, including off-site project alternatives. The close relationship between the project component and the Agency requires a detailed off-site alternative analysis. A more in-depth market analysis is also necessary. The DEIR fails to adequately analyze the significant and cumulative impacts associated with physically disrupting the business urban core with a twelve acre hospital campus.

A Plan amendment is required for the project. The project radically deviates from the Plan's plan to foster a revitalized retail/commercial urban core. Documents attached to this letter contain the Plan amendment documents included into the Plan based on the Agency's concerns and stated goal of retail/commercial redevelopment.

The DEIR economic analysis is incomplete and misleading. Chula Vista cannot afford to loose strong viable businesses, and does not need an expanded Scripps Hospital in Area Four.

RESPONSES

111.

A discussion of alternative sites is presented on pages 151 and 152 of the DEIR. As stated on page 151, a primary objective of the proposed project is expansion of the existing hospital facility. This objective could not be achieved by selection of an alternative site.

A market analysis was included in the Socioeconomic Considerations Report included as Appendix G to the DEIR. Please refer to the Introduction to this FEIR as well as Item #1 of Attachment A to these responses for presentation of detailed responses to comments on the Socioeconomic Considerations Report.

As stated in the DEIR (page 45), elimination of existing commercial uses from the project site is not expected to have significant effects on the overall character of the central Chula Vista area. It is anticipated that the on-site businesses would be relocated. As discussed in response to Comment #37, relocation sites have been identified for some of the existing facilities within the existing urban core.

112.

Please refer to response to Comment #4. The City of Chula Vista has determined that the proposed project is consistent with the Town Centre II Redevelopment Plan. A redevelopment plan amendment would not be required to implement the proposed project.

113.

Please refer to the Introduction to this FEIR as well as Item #6 of Attachment A to these responses for presentation of a detailed response to this comment.

COMMENTS

RESPONSES

114. It is the professional opinion of the EIR Preparers and City staff that the DEIR presents a thorough and objective analysis of the proposed project and the project alternatives.

115. Please refer to response to Comment #114.

116. Please refer to response to Comment #113. Also, please refer to Attachment A, responses to economic questions for clarification.

117. Please refer to response to Comment #112.

118. The division of existing on-site uses on page 36 of the DEIR into three groups was done by the EIR Preparers for ease of presentation and to facilitate the readability of the environmental document. The Town Centre II Redevelopment Plan, as amended, and the accompanying Town Centre II Redevelopment Plan EIR (City of Chula Vista EIR 88-3, SCH 88033016, May 1988) which addressed the inclusion of Area Four into the Redevelopment Plan area did not use these divisions.

RTM, Inc. respectfully requests the following:

- 114** project alternatives:
1. The EIR should objectively analyze the project and alternatives.
 2. The EIR should objectively evaluate off-site alternatives that prevent a physical disruption of the Chula Vista business urban core.
 3. The EIR should challenge the project proponent to provide marketing data supporting the demographic and economic assumptions used to support the project; and.
 4. The EIR must require a Plan amendment to mitigate the project's inconsistency with the Plan.

115. THE DEIR FAILS TO OBJECTIVELY DESCRIBE AND ANALYZE THE PROJECT

The Agency is responsible for the adequacy and the objectivity of the EIR. The EIR EIRI reflect the Agency's Administrative Judgment (California Environmental Quality Act ("CEQA") Guidelines Section 15084).

116.

The DEIR is not objective. For example, the DEIR actually segregates the existing Area Four businesses into three groups: Convenience Restaurants, Community Shopping Facilities, and Youth-Oriented Facilities. The Farfalli Ice Cream Parlor serves the community, but the Arby's Restaurant with its various civic activities, serves "convenience." This segregation of Area Four businesses is based on a political deal struck when Area Four was included into the Plan despite expressed reservations of current Agency Chairperson Tim Mader (see below). The DEIR so lacks fundamental objectivity that it is flawed and inadequate. The DEIR, intended to serve the best interests of the public, seems firmly controlled by the project proponent. Reviewing how Area Four was placed into the Plan reveals much about this project and why the DEIR lacks objectivity.

COMMENTS

C. THE DEIR SHOULD CONSIDER THE BASIS OF THE AGENCY INCLUDING AREA FOUR INTO THE PLAN

1. The Project Violates The Plan.

Area Four was not included into the Plan for a twelve acre hospital campus. Attached as Exhibit "A" to this letter is a copy of excerpts from the June 1988 proposed second amendment to the Town Centre II Redevelopment Plan. Area Four is referred to as "retail/commercial." A copy of excerpts from the May 6, 1988, Draft Supplemental Environmental Impact Report for the Town Centre II amendment, page 107 is attached to this letter as Exhibit "B" and states: "site 4 (Area Four) is designated as retail/commercial and is zoned C-C-D (Central Commercial/Design Control Modifying District). Further, page 109 of the same document states: "the retail/commercial (site 4) was allowed to be located outside the Plan inclusion." Area Four is clearly outside the Plan inclusion. The Plan was based on the Plan's stated intent to forward retail/commercial redevelopment.

2. Area Four Property Owners and Business Tenants Were Not Included Into The Plan.

Attached as Exhibit "C" to this letter is a copy of the minutes from a joint Chula Vista Council and Chula Vista Redevelopment Agency meeting dated July 12, 1988 ("minutes"). As reflected on pages 11 and 12, representatives of Area Four leasehold interests expressed concern regarding the Agency's redevelopment intentions. For example, Mike Clark, attorney representing Chula Vista Properties, stated his concern regarding the effect of placing Area Four into the Plan on attracting businesses to the retail/commercial site. Agency Director Desrochers stated that it was necessary to discuss land uses at that time, and noted that Agency staff is obligated to work with leaseholders on that property. Redevelopment coordinator Keenan apparently met with business owners who expressed their concerns regarding the city's plans and their willingness to work with staff. ATM was not aware of that meeting.

The minutes, page 12, continue as follows:

"The Paltier, leasehold property owner of the Bank and Urgent Care Center in property area #4, explained his involvement with the original lease on this area #4 and involved Council, the Owner Mr. Cohen, lives in West. The Bank and Urgent Care Center will be included in the proposed amendment but approval of the amendment does not mean it should necessarily affect the property. (Emphasis added.)"

The "Bank" and "Urgent Care Center" are the First Interstate Bank and Reducers Center that, with ATM, formed the "H" Street Coalition that has forwarded an alternative redevelopment proposal to avoid forcible relocation from Area Four. That these businesses were initially excluded from redevelopment participation, and now face a pre-decided project that displaces them, is hardly consistent with what was initially told to Area Four property owners by the Agency.

The minutes, page 12, then provide as follows:

"Todd McCreehy stated that he had a vested interest in Area #4 and questioned the type of development planned and the time it will be implemented. Director of Community Development Desrochers reported the Redevelopment Plan is a implementing [sic] provision of the law that allows the Agency to take certain actions. The time line is really dependent on the property owners and the tenants. The Agency would like to see the property improved and present a comprehensive plan for the area. If the general contractor, designate a representative to orient them for a plan. It could be completed area quickly, but until the proposed conditions are met, the Agency does not have the ability to talk to the owner and tenants." (Emphasis added.)

The project not only violates the Plan, but the Agency's stated intentions in including Area Four into the Plan.

3. Agency Members and Staff Are Lagging Prior Stated Concerns In Forwarding The Project.

The minutes, page 13, show present Agency Chairperson under acknowledging that aesthetics is considered a driving force behind redevelopment efforts and reported his desire for affordable housing and recreational uses. The project introduces giant institutional buildings into what was supposed to be a developed commercial site to assist the Chula Vista Shopping Center, has serious design flaws, and does not appear to provide affordable housing or recreational uses.

RESPONSES

119.

The basis for the Redevelopment Agency including Area Four in the Town Centre II Redevelopment Plan is not an appropriate discussion to include in the environmental document for the proposed hospital expansion. Separate environmental review has already been completed for the redevelopment plan amendment which incorporated the project site into the Town Centre II Redevelopment Plan. The reference for the Town Centre II Redevelopment Plan Amendment EIR is as follows: Draft Supplemental EIR Town Centre II Amendment, City of Chula Vista EIR 88-3, SCH 88033016, May 1988 and is available for review at the City of Chula Vista Planning Department.

120.

The referenced alternative (the H Street Business Coalition Alternative) is analyzed in detail on pages 132 - 141 of the DEIR.

121.

As noted in response to Comment #4, the City of Chula Vista has determined that the expansion of existing institutional uses on the project site as proposed by the project would be consistent with the Town Centre II Redevelopment Plan. Improvements to the existing visual or aesthetic character of the project have been incorporated into the proposed project as described on pages 53 - 67 of the DEIR. Neither affordable housing opportunities nor recreational uses are incorporated into the proposed project or into the alternatives analyzed in the DEIR. (The Retail and Entertainment Alternative includes opportunities for retention and expansion of existing youth-serving facilities.) As described on pages 42 and 43 of the DEIR, existing land use and zoning designations on the project site call for development of the property with office commercial and retail commercial uses. A plan amendment and rezone would be required to develop affordable housing on the project site.

120

121

RESPONSES

122. Please refer to response to Comment #8. A reference to discussions between the hospital and the Redevelopment Agency in 1988 has been added to page 21 of the FEIR. The Town Centre II Redevelopment Plan Amendment which included Area Four into the redevelopment plan area was approved by the Chula Vista City Council on July 12, 1988.

123. Please refer to the Socioeconomic Considerations Report included as Appendix G to the DEIR and Attachment A to these responses to comments. A requirement for in lieu payments will be incorporated into the Owner Participation Agreement (OPA) for the proposed project to ensure revenue to the City whether or not Phase Ultimate of the proposed project is constructed. This requirement would also serve as an incentive to the landowner to completely build out the project.

COMMENTS

Pages 13 and 14 of the minutes show that then Agency member Hader "questioned the time constraints." Resolution 933 and Ordinance 2274 were apparently being pushed rapidly forward despite questions and concerns raised by Area Four property owner representatives. Agency Director DeLoach explained that the rush was due to the "immediate need to file the resolution and ordinance with the San Diego County to receive tax increments."

Page 14 of the minutes reveals serious concerns whether Area Four should be included in the Plan. Agency consultant Frank Spevack apparently answered Mr. Hader's questions by stating that the project would be included in the redevelopment project area since the owner of the property owned as long as the Agency is doing the work for the public purpose of taking money for tax increments. In reality, the Agency director was pushing for tax increments, and Area Four property owners and tenants either were uninformed regarding plan inclusion, or were told their permission and active participation was necessary for a "retail/commercial" redevelopment. There is no record of a request for Area Four to be included into the Plan.

The minutes, page 13, reflect that then Agency member Hader moved to amend the Ordinance to delete Area Four from the Plan. This motion "failed for lack of a second. The motion was then amended by current Agency members Moore and Hader to "direct staff to increase the tempo of liaisons with property owners and tenants to provide more thorough background information and potential in more depth without making commitments." What liaison with what tenants was never approached. Another "addition to the motion" forwarded by prior Agency member Cox and residents White was to "include the concerns of the current Agency member Moore on #4 (Area Four) and #7." Then Agency member Hader joined in an addition to the motion with former Agency member McCandless "to include in the discussion and to clarify the City Council uses eminent domain." Really, who was excluded from the redevelopment process until it retained professional assistance, was never consulted regarding the project until it appeared a done deal, and has been threatened with eminent domain displacement for two years.

4. The Project Proponent Negotiated With The Agency The Same Month That Area Four Was Incorporated Into The Plan. If Not Earlier.

A memorandum dated July 21, 1988, from the project proponent to Agency Director Deschrocher specifically references negotiations with the Agency regarding a hospital expansion into Area Four. A copy of this memorandum is Exhibit D of this letter. The ramifications are startling. While the project director and Agency members were talking about business about permission and participation had already been discussed about redevelopment, the Agency may have been negotiating with the project proponent regarding hospital expansion that, according to the depon stated to the July 21, 1988, memorandum, would displace every Area Four property interest and business tenant. The memorandum specifically refers to a prior discussion.

Current Agency members Hader, Moore and Malcom were Agency members in July 1988, when the Agency negotiated with the project proponent and assured Area Four representatives. Curiously, Agency member Malcom excused himself from the July 12, 1988, Agency hearing on Area Four Plan inclusion, then returned after Resolution 933 and Ordinance 2274 were approved by the Agency. Agency member Malcom has voted on this project ever since.

5. The DEIR and Agency's Lack of Objectivity Highlight The DEIR and Project Plans.

The blatant unfairness of the DEIR and Agency actions are relevant to the DEIR's legal inadequacy for a number of reasons. The project violates both the Plan and the Agency's stated intent in including Area Four into the Plan. The Agency's true objectivity is doubtful.

Also, the DEIR might note that even if project phase I is built, project phase II is not necessarily certain due to tax incentives. Based on the project's history, Court intervention may significantly alter the project if it finds project pre-determination and violations of due process. For example, in the recently decided case of City of Los Angeles v. Chadrwick, 91 D.A.R. 10912 (1991), the Court of Appeal found both project pre-determination and violations of due process by a municipality that refused to consider off-site project alternatives, undertook shallow CEQA compliance, and took by eminent domain a business site for a public facility. The remedy in this case was monetary compensation. This is because the offending facility was completed before the Court of Appeal's ruling.

COMMENTS

RESPONSES

124. Please refer to response to Comment #119. Separate environmental review has already been completed addressing the inclusion of Area Four into the Town Centre II Redevelopment Plan area.

125. A comprehensive discussion of alternatives and alternative sites is included in the DEIR. CEQA requires public disclosure of the plan evolution process which resulted in selection of a particular alternative as the proposed project and a discussion of alternatives which would mitigate identified environmental impacts. The plan evolution process is described in detail in Section 2.2 of the DEIR, Project Background, and in the May 23, 1989 Redevelopment Agency Agenda Statement which has been incorporated by reference into the DEIR. As described in the DEIR, the draft document was recirculated to incorporate analysis of two additional alternatives to the proposed project - the H Street Business Coalition Alternative and the Retail and Entertainment Alternative. These alternatives are analyzed in detail in the DEIR based on project descriptions supplied by the proponents of these alternatives and a quantitative traffic analysis has been completed for each alternative.

An analysis of alternative sites is presented on pages 151 and 152 of the DEIR. CEQA requires that a reasonable range of alternative sites be evaluated in EIRs based on identified project objectives. As stated on page 151 of the DEIR, a primary objective of the proposed project is expansion of the existing community hospital facility. The range of alternative sites which could achieve this objective is limited.

126. Please refer to response to Comment #111. No significant environmental effects have been identified for the proposed relocations since similar uses are available within the project area and it is anticipated that the existing uses would be relocated in the central Chula Vista area.

A complete and adequate EIR must be considered before proceeding with the project. Misugi v. City of Glendale, 56 Cal. App. 3d 777 (1976). CEQA Guidelines Section 15090. The App. 3d Commission are not serving the best interests of the public by failing to request the DEIR address the issue raised by the Agency's misguided Area Four redevelopment.

The attached documents evidence a "close relationship" between the Agency and the nor project proponent that translates into a neighborhood requirement to evaluate off-site project alternatives under CEQA. Laura Malaga Improvement Assn. v. Regents of University of California, 47 Cal. 3d 376, 253 Cal. Rptr. 426 (1988). The DEIR's off-site analysis is shallow and simplistic.

6. The DEIR Fails To Adequately Evaluate Project Alternatives And Off-Site Alternatives

Project alternatives must be described with a degree of specificity corresponding with a degree of specificity of the project description. Asherton v. Board of Supervisors, 196 Cal. App. 3d 346, 350-351, 1983. Although the DEIR project description is inadequate, the DEIR project alternatives and off-site alternatives analysis is worse.

The DEIR fails to justify the conclusion that displacing all of the businesses from Area Four, and disrupting urban core commercial development, is not a significant impact requiring mitigation. The project clearly includes complete business displacement from Area Four, including the patrons and employees of the Area Four business. A more thorough analysis of the project's impact on the Area Four business displacement and the impact of this on the plan's stated goal of revitalizing and amplifying urban core commerce. The DEIR must evaluate project alternatives including off-site alternatives, in order to comply with 15126(d). The DEIR fails to properly consider reasonable off-site alternatives and is therefore inadequate. Chula Heights Improvement Assn. v. Regents of University of California, 47 Cal. 3d 376, 253 Cal. Rptr. 426 (1988). City of Colton Valley v. Board of Supervisors, 197 Cal. App. 3d 1167, 1180, 243 Cal. Rptr. 339 (1988). Incidentally, the DEIR must analyze project alternatives. San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino, 155 Cal. App. 3d 738, 202 Cal. Rptr. 423 (1984).

COMMENTS

RESPONSES

127. Please refer to the Introduction to the FEIR as well as Item #1 of Attachment A to these responses for a detailed response to this comment.

7. The DEIR Should Challenge Private Amenities.
The project proponent, presumably to justify the project, has consistently stated that the project is necessary to serve the needs of the region. It is inconceivable that the DEIR has not provided a market analysis that supports the project's absolute need. For Area Four, DEIR page 151 purports to analyze self-site alternatives for the project without any independent verification or research. This is particularly inadequate.

127

An essential project element is that patients and wealthy physicians with disposable income will over the region's study in the DEIR that adequately document this. The public deserves to know why a project with unmitigatable significant impacts should proceed if the very basis for the project remains questionable.

128

The DEIR refers to Phase II of the project. The DEIR indicates that this may occur in as many as 13 to 18 years after phase I is completed. However, the DEIR seems to suggest that Phase II will ultimately be built due to the financial constraints placed on the project proponent. In particular, the DEIR seems to rely heavily on an economic analysis conducted by Mr. Onaka.

129

An assumption that "patients and wealthy physicians with disposable income will come from all over the region to an expanded hospital" is not an essential project element. Please refer to Attachment A, Item #1 of these responses to comments for a discussion of the market anticipated to be served by the proposed project. As noted on page 128 of the DEIR and in the Socioeconomic Considerations Report included as Appendix G, it is anticipated that approximately 480 new jobs would be created with implementation of the proposed project. The Socioeconomic Considerations Report concludes, as stated on page 174 of the DEIR, that the jobs created by the proposed project "would increase job opportunities in the urban core, increase retail expenditures and indirectly strengthen the economic base of the city."

129. Please refer to response to Comment #123. The DEIR does not state or suggest that Phase Ultimate of the project will be constructed due to the financial constraints placed on the project proponent. Indeed, a recommendation included in the fiscal analysis summarized in the DEIR (page 175) suggests that the Redevelopment Agency should require the project proponent to pay property taxes or in lieu payments even if Phase Ultimate facilities are not constructed.

RESPONSES

Please refer to Item #1 of Attachment A of these responses to comments for a discussion of the market anticipated to be served by the proposed project. A discussion of potential alternative sites in the eastern portion of Chula Vista is presented on pages 151 and 152 of the DEIR. As noted on page 152, "environmental impacts associated with the alternative sites would likely be similar to those identified for the proposed project... Since much of the Eastern Territories is currently undeveloped and still overlain with native vegetation, biological and cultural resource impacts could result from development of an alternative site in the Eastern Territories." Impacts associated with water usage, both site-specific and cumulative, may occur on site. As stated in response to Comment #222, a water conservation plan would be required for development of a hospital in the Eastern Territories. Visual impacts may also occur with development of a hospital in the Eastern Territories as most of the area is currently undeveloped and development of a hospital in an undeveloped area may cause visual impacts. Land use impacts may occur as it is expected that communities in the Eastern Territories will be developed primarily with residential uses. The development of a hospital in a residential area may cause land use impacts. It is anticipated that impacts associated with noise, air quality, traffic and geology would not be significant, however specific analysis would be required.

In addition, as noted on page 151, expansion of the existing hospital facility is one of the primary objectives of the proposed project. This objective would not be achieved by relocating the entire hospital to another site.

If only the expansion were to occur on an alternative site in proximity to the proposed project, such as in the Eastern Territories, redundancies in certain administrative and other functions would need to occur in order to operate an expanded hospital complex at two separate sites.

As stated in Section 4.3, Traffic and Parking (page 83), the widening of H Street is a mitigation measure associated with the proposed project. This mitigation measure is also included in Table 16, Mitigation and Monitoring program in the FEIR.

COMMENTS

The last page of Mr. Onaka's economic analysis concludes with a requirement that future smaller project evaluate market needs. It is the responsibility of this Agency to evaluate the market need for this project, particularly for Phase II. This is wholly lacking. Phase II, as a larger future project, must be analyzed (not promoted). Kaural Nalakhie Improvement Association v. Regents of the University of California, 47 Cal. App. 3d, 376, 253 Cal Rptr 426 (1988).

The DEIR states that the project could not occur in East Chula Vista because of the need to expand the downtown Chula Vista facilities due to patient overcrowding. This is absurd. If the downtown Chula Vista Scripps Hospital is actually brimming over with patients, a regional facility in East Chula Vista can meet the regional needs (if any). A regional hospital can be placed in East Chula Vista. The DEIR fails to not only underpinning of the Scripps project, but blindly and glibly accepts the notion that the project can only happen in downtown because the project proponent says so. This will cause a terrible decline in the business urban core of Chula Vista.

The DEIR must analyze the demographic likelihood that new patients will actually use the expanded hospital, and where the patients will come from. If the expanded hospital is to be feasible in scope, the DEIR should consider why a regional hospital cannot be located in another part of Chula Vista.

DEIR page 171 requires further analysis. Mr. Onaka's economic explanation uses some form of new math to justify Chula Vista losing eleven viable businesses from the business urban core. His analysis assumes that Phase II of the project must occur due to detrimental tax effects. This simply is not enough. Where is the financial analysis of the project proponent in order to determine whether or not Phase II would actually occur? Where is the analysis that justifies Phase II in the beginning? If, as Mr. Onaka states, Chula Vista has a high proportion of business use, then why not analyze the high proportion of hospital use, plus the recent planned expansions of hospital institutions in East Chula Vista?

In that regard, please find enclosed attached as Exhibit "D" to this letter a copy of a memorandum from Agency staff member Kasman to you. This memorandum is an explicit Agency admission that without Phase II, commercial utilization of Area Four is appropriate. Why did the Agency drop the widening of "H" Street to forward the project? This is not what CEQA requires. Further, the attached memorandum serves as specific, explicit evidence that the Agency has in essence predetermined that the project has been the only approved project truly evaluated since 1988. This only serves to amplify the inadequacy of the DEIR to objectively and honestly evaluate the project and to objectively and honestly evaluate deficiencies with the plan and would mitigate the significant incongruities with the plan and significant impacts associated with disruption of the business urban core.

130.

131.

COMMENTS

RESPONSES

132.

Please refer to response to Comment #4. The City of Chula Vista has determined that the proposed project would be consistent with the Town Centre II Redevelopment Plan.

Finally, the DEIR fails to accurately describe business relocation and the private injury that will occur. The DEIR includes a comment that all businesses will be relocated--this ignores Scripps' stated position that only two of eleven businesses will be "successfully relocated." If the DEIR is to truly address business relocation, the Commission and Agency should request the DEIR require Scripps Owner Participation Agreement that provides for the successful relocation of Area Four businesses slated for displacement. This would help insure consistency with the Plan. Alternatively, the DEIR should correctly refer to the limited relocation assistance available should eminent domain litigation proceed to forcibly relocate all Area Four businesses.

D. DEIR MUST ADEQUATELY EVALUATE THE ECONOMIC BENEFITS OF THE PLAN AND THE SCRIPPS PROJECT.

As reflected in the attached exhibits, Area Four was intended for retail/commercial redevelopment.

Although the DEIR mentions the "H" Street Coalition and existing business tenants alternatives, it remains apparent that the fair opportunity to participate in the redevelopment of Area Four. The Agency recently voted to provide "omnibus" funding to forward the project only. The H Street Coalition project and the Circinus project are agreeing to conform with the Plan (as it is actually written). They must be provided the opportunity to participate (California Health and Safety Code Sections 33037, 33339); County of San Diego, City of Missionville, 177 Cal. App. 3d, 831, 840-841, 1985). Every reasonable effort must be extended to business in the project area to re-enter in business in the project area. California Health and Safety Code Section 33339.5.

Following Article I, Section 120, of the Plan states the following goals:

- a. Strengthening the mercantile posture and retail trade of Town Centre II;
- b. Retaining and expanding viable land uses, commercial enterprises and public facilities in the area;
- c. Attracting capital and new business enterprises to the project area; and,
- d. Promoting (1) the Chula Vista Towns Centre I project area, as the principal center of specialty-goods purveyance in the South Bay sub-region.

The Preliminary Report For The Second Amendment For The Town Centre II Redevelopment Project, dated May 19, 1988, stated that the Plan was amended to "facilitate the retention and expansion of as many of the existing commercial enterprises as possible through redevelopment activities, and to encourage the participation of both the existing and new businesses. This amendment also states "Market studies show that there is demand for additional commercial uses in the area that complement the uses proposed for the Chula Vista shopping center. Including the swap meet Site area (Area Four) in the Amendment Area the Agency desires to use redevelopment tools to facilitate the redevelopment of this site with complimentary uses to enhance the economic viability of the area."

COMMENTS

RESPONSES

2. THE DEIR MUST REQUIRE A PLAN AMENDMENT IN ORDER TO MITIGATE THE SCRAPER PROJECT INCONSISTENCY WITH THE PLAN.

133

As reflected by the attached documents, the project was forwarded through a smokestack that prevented fair and equitable evaluation of plan consistency. Since inconsistency between a project alternative and plan may render a project alternative infeasible (California v. Sierra Valley V. Board of Supervisors, 197 Cal. App.3d 1187, 1180, 243 Cal. Rptr. 339 (1988)), the project inconsistency with the Plan renders the project infeasible.

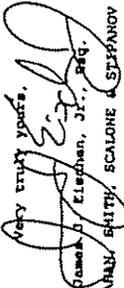
The project is clearly inconsistent with the Plan and supporting reports and documents. The DEIR is inadequate for failing to recommend as a mitigation measure that the Plan be amended to accommodate the project. Only by the process of amending the Plan will the project truly receive the fair, open, and honest evaluation necessary to weigh whether the project should proceed as proposed. As a "fully developed" business location (DEIR, page 46) in a Plan Area designated as "retail/commercial" the Area Four businesses who were misled in 1988 now deserve an opportunity for the project, and project alternatives, to receive a fair public airing out.

Because of the disruptive, non-conforming nature of the project, project inconsistency with the Plan and the critical lack of public input evidenced by the attached documents, the DEIR must recommend a Plan amendment. Otherwise, the DEIR is simply promoting a project that violates the letter and spirit of applicable redevelopment and CEQA law.

F. CONCLUSION

The DEIR solely favors the project proponent. Off-site alternatives must be evaluated given the close relationship between the Agency and the project proponent. The project will cause a physical disruption of the Chula Vista Business Urban Core--a significant impact. The project violates the Plan, and relies more on assumptions than strong market data.

In summary, the DEIR lacks objectivity--the very purpose of an EIR. Given the history of Area Four redevelopment, RTH respectfully requests that the EIR recommend the necessary curative measures.

Very truly yours,

James J. Eichen, Jr., Esq.
SHANNAN, SMITH, SCALONE & STEFANOY

Enclosures

cc: J. Russell Welch
Charlie Harmon
Gail MacLeod
Chula Vista Chamber of Commerce
Towne Centre II Project Area Committee
Wayne Mancke
Joseph Solomon, Esq.

133. Please refer to response to Comment #132.

RESPONSES

COMMENTS

THE TEXT OF THE
PROPOSED SECOND AMENDMENT
TO THE
TOWN CENTRE II
REDEVELOPMENT PLAN

Prepared for:

Chula Vista Redevelopment Agency
276 Fourth Avenue
Chula Vista, California 92010
(619) 691-5141

Prepared by:

Rosanow Spawack Group, Inc.
414 West 4th Street, Suite E
Santa Ana, California 92701
(714) 541-4385

June, 1989

EXHIBIT "A"

COMMENTS

RESPONSES

MINUTES

- 8 -

July 12, 1988

JOINT COUNCIL/REDEVELOPMENT MEETING

22. REPORT ANALYZING A PROPOSAL FROM ST. VINCENT OF PAUL CENTER TO DEVELOP THE REDEVELOPMENT AGENCY'S PROPOSED RELOCATION MOBILHOME PARK (Community Development Director)

This item was tabled pending the arrival of Father Joe Carroll and follows item 23.

PUBLIC HEARINGS AND RELATED RESOLUTIONS AND ORDINANCES

At 7:28 p.m., Councilman Helcola left the city.

JOINT COUNCIL/REDEVELOPMENT MEETING

23. PUBLIC HEARING REGARDING SECOND AMENDMENT TO THE TOWN CENTRE NO. 11 REDEVELOPMENT PLAN AND FINAL EIR FOR SAID AMENDMENT (Community Development Director)

Mayor Cox announced that all Members of the Redevelopment Agency were present with the exception of Member Helcola. This being the time and place as advertised the public hearing was declared open.

Chairman Cox reported that prior to proceeding with the public hearing on the Redevelopment Plan Amendment and Final EIR, the Agency must first approve the Owner Participation Rules and Regulations, Allocation Assistance Rules and the Agency Report to the City Council on the Redevelopment Plan Amendment.

Mayor Cox reported the purpose of this joint public hearing is to consider and act upon (1) the proposed Second Amendment to the Town Centre No. 11 Redevelopment Plan and Project Area; and (2) the Final Environmental Impact Report on the Redevelopment Plan Amendment.

Exhibit A, Affidavit of Publication of the Public Hearing; Exhibit B, Certificate of Meeting of Notice of Public Hearing to each property owner in the Project Area as shown on the last equalized assessment roll; and Exhibit C, Certificate of Meeting of Notice of Public Hearing to the governing bodies of the Agency within the Project Area were received by Councilman Helcola as part of this record and filed in the office of the Executive Secretary of the Redevelopment Plan of the City of Chula Vista.

EXHIBIT "B"

RESPONSES

COMMENTS

Attachment

Excerpt

DRAFT
SUPPLEMENTAL
ENVIRONMENTAL IMPACT REPORT
TOWN CENTRE II AMENDMENT

City of Chula Vista EIR 24-3
SCH No. 24013016

Prepared for:
The City of Chula Vista
Redevelopment Agency
276 Fourth Avenue
Chula Vista, CA 92010

Prepared by:
P&D Technologies, Inc.
401 West "A" Street, Suite 2300
San Diego, CA 92101

EXHIBIT "C"

COMMENTS

RESPONSES

The Land Use Elements of the General Plan discuss proposals and policies for each category of land use. The following is a summary of the range of uses that are allowed within each land use category. The high residential category (Site 2 and part of Site 6) would allow for single family, small apartment units, larger garden apartments, townhouses and cluster developments. The research and limited industrial category (Site 3 and western portion of Site 3) would allow uses such as manufacturing, processing and warehousing. The intensity of the general industrial uses allowed under the Chula Vista LCP (western portion of Site 3) are to be consistent with the existing Chula Vista zoning code (the Bayfront Specific Plan).

* The retail commercial (Site 4) uses allowed are intended to be neighborhood and community shopping centers. The thoroughfare commercial uses (northern portion of Site 6) include a mixture of retail, commercial and office uses. The future expansion of the Civic Center (Site 7) shall be in accordance with the Civic Center Master Plan. Land uses which are permitted within the visitor commercial designation (Site 8) include complexes of high quality tourist facilities including hotels with meeting and convention facilities, restaurants, service stations, and related facilities to serve the visitor or traveler. The Chula Vista Junior High School site (Site 9) is designated as a Junior High school site and Euclid Park (Site 10) is designated for open space/park use.

D. Impacts

No direct, significant impacts would occur from approval of the proposed project. However, future redevelopment of the 10 amendment area sites could result in a variety of land use changes for each of the sites. As mentioned earlier, the proposed project is the amendment to add approximately 147 acres (the "Amendment Area") of property to the existing Town Center II project area. As a basis for the redevelopment of the Amendment Area, the Redevelopment Plan Amendment proposes that permitted land uses be commercial, residential, and institutional and complementary to the adjacent uses. Pursuant to the Community Redevelopment Law all uses permitted in the Amendment Area shall conform to the Chula Vista General Plan as it currently exists or to hereinafter amended. Likewise, limits on building intensity shall be in accordance with the standards contained in the Chula Vista General Plan.

COMMENTS

RESPONSES

The Montgomery Specific Plan (Figure 3-6) is an intermediate level plan which is more detailed than the Chula Vista General Plan. Site 3 is designated for medium density residential use (R-11 du/ac). The zoning designation over most of the site is RV-15 (14.3 du/ac) except for the central parhandle section which is zoned RU-29 (29 du/ac).

Site 2 is designated for high residential density (13-26 du/ac) and is zoned R-3 (Apartment residential zone).

All of Site 3 and the western portion of Site 3 are designated research and limited industrial. The western one-half of Site 3 is within the jurisdiction of the Chula Vista Local Coastal Program (LCP) and is designated limited industrial. Both Site 3 and the eastern portion of Site 3 are zoned I-L (limited industrial). The western portion of Site 3 (the area within the Coastal Zone) is zoned general industrial. In addition, Site 3 is within the P-1 zone (Woodway).

Site 4 is designated retail commercial and is zoned C-C-D (Central Commercial/design-control modifying district).

Site 6 is largely designated thoroughfare commercial except for the northwest corner which is designated high residential (13-26 du/ac). The zoning designation is thoroughfare commercial.

Site 7 is designated for civic center uses and is zoned C-O (Administrative and Professional office).

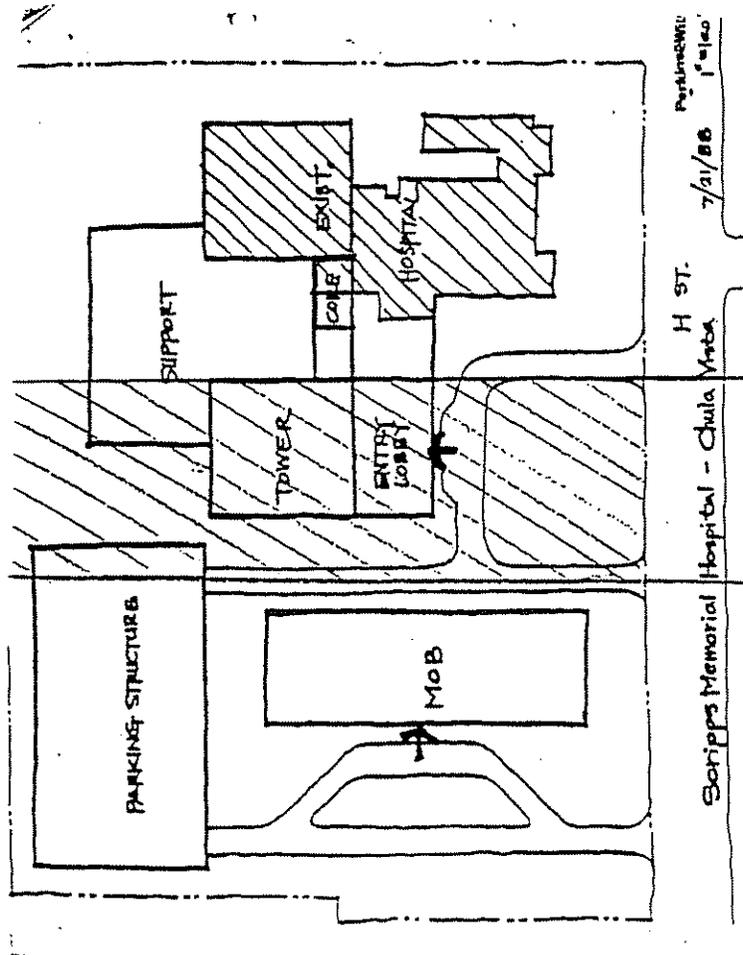
The northern portion of Site 8 is designated for Visitor Commercial and the southern portion is designated for research and limited industrial. Site 8 is zoned C-V (Visitor Commercial).

Site 9 is designated as a Junior High School site and is zoned R-3 (Apartment Residential).

Site 10 is designated as parks and public open space and is zoned R-3 (Apartment Residential).

RESPONSES

COMMENTS



RESPONSES

COMMENTS

(*Planning*

DEC 31 1990
PLANNING

December 26, 1990

TO: Maryann Miller, Contract Planner/Environmental Section

FROM: Fred Kasman, Redevelopment Coordinator *FK*

SUBJECT: Scripps Traffic Report

I have a major problem on the attached pages. For obvious reasons, I did not send the report to Jim Leary for comment.

We have been trying to push Scripps to commit to the timely completion of Phase 2 and are negotiating payment of in-lieu taxes if Phase 2 is not constructed by Year 5. By conditioning Phase 2 to the widening of East H Street between I-5 and I-805, which probably won't happen in our life time, we are "kissing off" Phase 2 and, consequently, most of our anticipated income from this project. This condition will give Scripps a great excuse to put off Phase 2 indefinitely and an argument against in-lieu tax payments since they would be precluded from completing the project by the City.

Without timely completion of Phase 2, or in-lieu tax payments, this project doesn't make economic sense to the City. We would be better off with a commercial project.

FK:sc

cc: Chris Salosona, Community Development Director
Ed Morris, Deputy City Manager
Hal Rosenberg, City Traffic Engineer

(Scripps4)

EXHIBIT "E"

COMMENTS

RESPONSES

134.

Please refer to the discussion on page 3 of the DEIR. As stated on page 3, the recirculated DEIR responds to various concerns raised by commentors on the prior draft EIR. "Readers are advised that if they feel that any points raised in their earlier comments are not adequately addressed in this Recirculated Draft EIR, they must submit these points in a new comment letter before the end of the public comment period. This Recirculated Draft EIR supercedes all previous drafts."

A previous memo from Mr. Wencke identified alternative sites for the proposed project in the City of Chula Vista's Eastern Territories. Potential sites in the Eastern Territories are referenced in the alternative sites discussion presented on pages 151 and 152 of the DEIR. Please refer also to response to Comment #125. A primary objective of the proposed project is expansion of the existing community hospital facility. The range of alternative sites which would meet this objective are limited.

Complete responses to the present A. D. Hinshaw and past and present Monroy-Lopez Engineering letters are included in these responses to comments (30-62 and 86-94 respectively). Please refer to item #s 2 and 3 of Attachment A to these responses for a response to Circinus Corporations' present comments on the economic analysis.

Although the commentor did not submit new comment letters regarding their concerns of the content of the DEIR as requested in the recirculated Draft DEIR, we are responding to past letters that have been referenced in this September 23rd letter.

Past letters from the law office of Worley, Schwartz, Garfield & Rice, A.D. Hinshaw and Circinus Corporation are attached following this letter and all responses are provided for all comments.

WORLEY, SCHWARTZ, GARFIELD & RICE
ATTORNEYS AT LAW
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SUITE 100, SAN DIEGO
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 591-0044
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RONALD S. WOLFE
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September 23, 1991

Ms. Maryann C. Miller
Environmental Review Coordinator
Planning Department
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

Re: Scripps Hospital Extension

Dear Ms. Miller:

This firm represents Circinus Corporation, Wayne Hencke, President, one of the owners of the aester ground lease covering the property upon which the above referenced redevelopment project is planned. This letter is referenced to comment upon the August 1991 Draft Environmental Impact Report (DEIR) prepared for the above-referenced project. Not only is the DEIR inadequate as a CEQA document, but, in addition, for the reasons stated below the City's redevelopment and condemnation process is so flawed as to completely invalidate this project.

THE DEIR IS INADEQUATE

The California Environmental Quality Act ("CEQA") is a means to force public agency decision-makers to document and consider the environmental implications of their actions. (Pub. Res. Code § Cal. 1000-1; *Elizondo v. Board of Supervisors* (1972) 18 Cal. 3d 117, 234-256 (104 Cal. Rptr. 761, 765-766).) Most project will. CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. (*Scripps Club v. Gilroy City Council* (6th Dist. 1990) 222 Cal. App. 3d 30, 41 (271 Cal. Rptr. 393, 398).)

In the present case, as a CEQA/engineering document, the DEIR is severely flawed. Firstly, the DEIR fails to respond to the comment letters already submitted. For example, Hencke's letters outlining alternative sites have been completely ignored. Rather than repeat the multitude of deficiencies referenced in the comment letters submitted, past and present, regarding this DEIR by this office as well as Circinus Corporation's EIR consultants, Philip Hinshaw, A.D. Hinshaw Associates, provides a general environmental analysis of the DEIR, pointing out numerous deficiencies. Edgar Monroy, Monroy-Lopez Engineering, points out that the traffic analysis in the DEIR is severely inadequate. Mike Jacobs, Vice-President, Circinus Corporation, makes clear the utter fallacy of the DEIR's economic analysis. The economic impacts are perhaps the most blatant abuse of City resources, in that Scripps proposes to claim the 8.9 acre site for one building and a large parking lot, with a nebulous and unenforceable promise to implement additional improvements in the next ten to fifteen years.

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RESPONSES

- 135.** Please refer to the Introduction to this FEIR as well as Item #2 of Attachment A to these responses for a detailed response to this comment on the economic analysis.
- 136.** Please refer to response to Comment #4. The City of Chula Vista has determined that a redevelopment plan amendment would not be required to implement the project.
- 137.** The comment is noted. It does not reflect on the adequacy or sufficiency of the DEIR and no response is necessary.
- 138.** Please refer to response to Comment #32. It is not appropriate for the DEIR for the Scripps Memorial Hospital Expansion project to evaluate issues which were already addressed in conjunction with adoption of the Town Centre II Redevelopment Plan.

COMMENTS

The DEIR states that, from a financial perspective, Circinus Corporation's Commercial/Retail proposal (identified as the "Retail/Entertainment/Recreative" in the DEIR) compares favorably with taking the project should Scripps go to phase ultimate. Even taking the economic analysis at face value, the Commercial/Retail proposal is the highest and best use. There is no phase ultimate, in fact little likelihood - that Scripps will go no phase ultimate, thus the Circinus Commercial/Retail proposal is clearly more beneficial to the City.

The DEIR further asserts that the Scripps project is consistent with the goals, objectives and provisions of the Town Center II Redevelopment Plan, which consistency obviates the necessity to affect a redevelopment plan amendment. However, the Redevelopment Plan designates the target site as retail commercial, therefore, a redevelopment plan amendment is necessary.

The DEIR states that discretionary actions include acquisition and disposition by "voluntary sale" or "use of eminent domain . . . including condemnation". Not once in the past five years that the City has been planning this project has the City, Scripps, or any other party to this matter approached my clients, the City, offers to purchase their interest in the site. Rather, the City has chosen to quite publicly "railroad" the site into adoption in an obvious (and successful) effort to unduly depress the value of my clients' interest in the site. (See letter from this office, dated July 17, 1991 to City Manager, John Coas, which letter merely prompted further harassment from the City.)

The DEIR identifies the redevelopment objectives, including "elimination of blighting influences". The listing of this objective clearly implies that the project site is a blighted area. To the contrary, the existing commercial uses are on the "constitute a serious physical, social or economic burden on the community"; rather, these uses currently cover city costs of providing services to the site and there are no documented associated physical or social problems.

COMMENTS

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Page Three

Another identified objective is the strengthening of the mercantile features of Town Center II, and the improvement of retail trade therein. Clearly, the Circinus Commercial/Retail proposal furthers this objective. Another stated objective is the retention and expansion of commercial enterprises and the attraction of capital and new business enterprises to the project area. Again, the commercial development proposal, unlike the Scripps proposal, furthers this goal.

Tying in with the discussion below regarding the inadequacy of the redevelopment and condemnation process, CEQA requires that an EIR be timely disseminated to allow project flexibility and meaningful environmental assessment. (Guidelines, sec. 15004(b); H.L. Sukro, Regina Samalson v. Regents of the University of California (1978) 77 Cal.App.3d 26.) Clearly the EIR is not timely; the City of Chula Vista first publicly considered the redevelopment in 1986, yet the EIR notice was not distributed until May, 1990, almost two years later.

THE REDEVELOPMENT AND CONDEMNATION PROCESS IS SEVERELY FLAWED

To preface these comments, it must be pointed out that the city has willfully and deliberately prejudiced Circinus Corporation's ability to effectively outline this matter at this time. Specifically, on September 5, 1991, I, as a representative of Circinus Corporation, arranged with the City Community Development Office to examine the public records regarding this matter. However, upon my arrival at the Community Development Office, I was informed by the City Attorney, Bruce Boogard, that the city had reneged on this agreement, and no records would be made available without a "list" of specific documents requested (an extremely unreasonable and bizarre demand considering that there was no way to provide a "list" of specific documents without first viewing the records). The city has since, in direct violation of the California Public Records Act, refused to timely make available the public records regarding this matter (reference correspondence, September 9, 1991). However, despite the city's lawbreaking attempt, it is clearly apparent that the redevelopment and condemnation process is so flawed as to make the furtherance of this project completely unlawful. To understand this requires a little history.

In 1986, Day Medical Center was experiencing severe financial difficulties. The city held outstanding bonds against the hospital and stood to suffer substantial financial loss should the hospital fold. In September 1986, Scripps Hospital purchased Day Medical Center, paying off the city bonds and in effect saving the city from severe financial loss. Section 2.0 of the DEIR, PROJECT DESCRIPTION (commencing on page 21) does not acknowledge these facts, but in less clear terms thinly masking the obvious conclusion that this railroad redevelopment and condemnation is merely political "payback."

139

140

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RESPONSES

139.

The comment is noted. The analysis of Circinus Corporation's Retail and Entertainment Alternative in the DEIR (pg. 143) states that the alternative's proposed retail and entertainment uses "are consistent with both the Chula Vista General Plan and the Town Centre II Redevelopment Plan goals and objectives." Please also refer to Item #6 of Attachment A, responses to economic questions for a discussion of complimentary land uses.

140.

The timing of preparation of environmental documents generally coincides with the timing of submittal of formal applications for discretionary actions by project proponents. The formal environmental review process for the proposed hospital expansion process, including preparation and public distribution of the Notice of Preparation (NOP), began after the formal application for the hospital expansion was submitted to the City of Chula Vista. It should be noted that the current environmental review process for the proposed project has been ongoing for well over a year. The NOP for the DEIR was distributed by the City of Chula Vista in April, 1990.

141.

The comment is noted. It does not reflect on the sufficiency or adequacy of the DEIR and no response is necessary.

COMMENTS

Immediately after the discussion regarding the Scripps buyout of Bay General, the DEIR states that, "in 1989, the City of Chula Vista and the Redevelopment Agency were contacted by Scripps Memorial Hospital with a proposal to expand the hospital onto the site. (DEIR pp. 21-24.) This section gives the false impression that the genesis of the Scripps proposal was in 1989. This is clearly untrue. On July 14, 1980, the City of Chula Vista Community Development Office commenced formal consideration of the redevelopment of the target site. Just two weeks later Scripps Hospital sent the City an outline of its project proposal (see enclosed memorandum from Scripps to the City dated July 21, 1980, incorporated herein as part of this comment letter). Obviously, Scripps had prior knowledge of the redevelopment plans; most likely, the redevelopment was initiated not because the site was blighted (it was not) but rather, unlawfully, at Scripps request. It appears that, as far back as September, 1980, when Scripps purchased the Bay Medical Center, Scripps immediately began planning with the City of Chula Vista for expansion in the City's public records, which unfortunately Mr. Boogard, City Attorney, has offered to make available only after, at his leisure, the City has reviewed and excised for exempted material." (See correspondence from City dated September 17, 1991.)

Page 24 of the DEIR lists those alternatives that were analyzed by the Community Development Department staff in 1989. Starkly missing from this list of six development alternatives is an alternative from my client, Wayne Wencke. This is because Mr. Wencke, though at the time one of the owners of the Master Ground Lease covering the entire property, was not timely solicited for a proposal. Therefore the Scripps Hospital Expansion project in Huntington Park v. Norma's Slauson (1985) 173 Cal.App.3d 1121, 191 S.W.2d 1986; City of Los Angeles v. Spencer Chadwick, 1991 WL 103370.)

Norma's Slauson is strikingly similar to the present case. A Redevelopment Agency adopted a redevelopment plan which mirrored state redevelopment law and was thus substantially similar to the Chula Vista Town Code and was thus substantially similar to the participation, improving the economic base, and acting only when private or governmental action short of redevelopment fails). The owner of "Norma's Slauson," a truck stop on the property, was

RESPONSES

142. Please refer to response to Comment #8.

143. The alternatives listed on page 24 of the DEIR are taken from the May 23, 1989 Redevelopment Agency Agenda Statement which has been incorporated by reference into the DEIR. The May 23 Agenda Statement does not reference an alternative presented by Mr. Wencke.

144. The comments are noted. They do not reflect on the sufficiency or adequacy of the DEIR and no response is necessary.

RESPONSES

COMMENTS

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notified of the plan, which like the plan in the present case
expanded in part its objective to "help existing businesses
expand." The court thus concluded that this did not effectively
notify the owner its property was in jeopardy. The City then
filed to condemn such of the property.

However, this condemnation was preceded by an agreement
between the Agency and the developer by which the Agency would
acquire the property and the developer would build condominiums
on the site. The agreement was followed by the issuance and sale
of bonds by the City to pay for acquiring the site.

"In short, the agency, without any notice to Horn's, in
effect sold the property and issued bonds to obtain the
money to acquire the property all before taking any
steps to condemn the property." (Id. at 1125.)

The court first pointed out that:

"A public agency can take private property only under
very limited circumstances, to wit, (1) the property is
necessary for a public project; (2) the project is in
turn necessary for a public purpose; and (3) the taking
of the particular property is compatible with the
greatest public good and the least private injury.
(Code Civ. Proc. § 1146.039)." (Id.)

The court then noted that, before adopting a resolution of
necessity, the Agency must

"engage in a good faith and judicious consideration of
the pros and cons of the issue and that the decision to
take must be buttressed by substantial evidence of the
existence of the three basic requisites set forth in
Code of Civil Procedure, Section 1146.039, et seq."
(Id. at 1125-1126.) [Emphasis supplied.]

The court explained that

"This limitation, which involves essentially a
comparison between the use of the site, has also been
described as "the necessity for adopting [a particular
plan] for a given public improvement [citation]."
Proper location is but one factor. [citation] Public good
and private injury are accordingly the condemnor's
primary concerns. [citation] The site would
involve an equal or greater public good and a lesser

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Private Injury" (Id. at fn. 1, citing Legislative Committee Comment to Code Civ. Proc. § 1240.030.) [Emphasis supplied.]

The court pointed out that:

"It is clear that the hearing which led to the adoption of the resolution of necessity was a sham and the Agency's policy making board simply 'rubbed stamps' a predetermined result."

"By the time the Agency actually conducted a hearing to determine the 'necessity' for taking the property in question, it had, by virtue of its contract with the developer and issuance of revenue bonds, irrevocably committed itself to take the property in question regardless of any evidence that might be presented at the hearing. All the while the owner has been misled if not deceived, as to what fate was going to befall his property."

"That hearing was thus affected not by just a gross abuse of discretion but by the prior elimination of any discretion whatsoever. The effect of that abuse was, in this case, nullify to deprive the resolution of any conceivable effect on the three critical issues involved. (Id. at 1127.) [Emphasis supplied.]

Finally, the court then concluded that, based upon the obvious lack of evidence of a proper decision-making process, there was no substantial evidence from the Agency that the taking was necessary for a public purpose or compatible with the greatest public good and the least private harm. The court therefore affirmed the trial court's decision to dissolve the taking.

In the instant case, as in *North's Emission*, by striking an agreement with Scripps to redevelop the site in exchange for the 1986 buyout of Bay General, the City effectively irrevocably committed itself to take the property for Scripps. Because of this unlawful "pre-selection" by the City, the City therefore cannot show by substantial evidence that any decision to select the Scripps project is based on a judicious and non-arbitrary process.

Chadwick, supra, is also extremely instructive. In May of 1991 the City of Los Angeles filed began condemnation of property for a fire station. The property owner was told "nothing would come of it and not to worry," yet the property was then

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constitute a gross abuse of discretion by the City of Chula Vista.

Also in the present case, as in Chadwick, since Mr. Wencke's due process rights have been violated, because he was not given a formal opportunity to be heard during the preliminary planning of the project on the question of whether or not it was necessary to take his property. Specifically, Mr. Wencke was improperly notified when in 1988 the City of Chula Vista first made public its intention for the Scripps Hospital Expansion. Despite Mr. Wencke's subsequent vigorous opposition, and in violation of the state redevelopment law and its local redevelopment plan, the City entered into an exclusive negotiating agreement with Scripps Hospital. Clearly this action violated the state and local redevelopment mandate of encouraging owner participation.

Like the City of Los Angeles in Chadwick, since the City of Chula Vista unlawfully misled Mr. Wencke while the City generated powerful momentum for the Scripps Expansion project, in effect irrevocably committing itself to take the property, when the City of Chula Vista first went public with the Scripps Expansion, Paul Desrochers, then Chula Vista Community Development Director, met with Mr. Wencke and told him not to let it would bring city funds would be a positive force for him, that it would bring city funds in to revitalize his property. Mr. Desrochers' misleading comments did by design forewarn Mr. Wencke from effecting more serious opposition. Therefore, the mere fact that the Scripps proposal has been withdrawn to its current status as the primary project in the DEIR, the result of a flawed, prejudicial, and unlawful process. The City has acted and continues to act in utter disregard of Mr. Wencke's civil rights, violating the constitutional mandates of equal protection and due process.

The DEIR points out that, commencing October 5, 1989, the Agency entered into what turned out to be a one-year Exclusive Negotiation Agreement with Scripps to develop the site. The DEIR further points out that, on October 18, 1990, the Agency extended this Agreement for an additional six months with the understanding that the Agreement become "seal-exclusive" without allowing other owners and tenants on the site to submit redevelopment proposals. However, as is shown by the amended tone in the DEIR in favor of the Scripps project, the amendment of the Negotiation Agreement from seal-exclusive to seal-exclusive did as a practical matter have no effect. Although the DEIR now includes the H Street Coalition proposal and the Circinus Commercial/Retail proposal, this does NOT correct the City's prior unlawful action - Scripps remains as the primary project; H Street and Circinus became mere "alternatives" and have been paid mere lip service by the City and in the DEIR. Therefore remain the prejudicial situation which the City commenced in 1988 by unlawfully selecting the Scripps project and effectively shutting out all other alternatives.

RESPONSES

145. Please refer to response to Comment #134. Page 3 of the DEIR informs readers of the recirculated DEIR that the recirculated document responds to various concerns raised by commentators on the previous draft and advises readers that "if they feel that any points raised in their earlier comments are not adequately addressed in this Recirculated Draft EIR, they must submit these points in a new comment letter before the end of the public comment period." Although the commentator did not submit new comment letters regarding their concerns of the content of the DEIR as requested in the recirculated Draft DEIR, we are responding to past letters that have been attached to this letter. Responses to Mr. Wencke's comments on the Maron 1991 DEIR has also been provided as noted in response to Comment #134.

146. The comments are noted. They do not reflect on the adequacy or sufficiency of the DEIR and no response is necessary.

COMMENTS

Further, the City has continued to act in a manner which continues to unlawfully pre-empt the Scripps project as well as Mr. Wencke's right to be heard during and after the public comment period for the March, 1991 DEIR. My client, Wayne Wencke, President, Circinus Corporation, submitted comment letters outlining various weaknesses in the DEIR. Though some were timely submitted, none of Mr. Wencke's comment letters included in the appendix to the August, 1991 draft EIR were adequately responded to nor included in the appendix to the August, 1991 draft EIR.

145

Another example of the City's denial of Circinus Corporation's constitutional rights is the fact that, in July of 1991, Circinus Corporation requested the opportunity to review a screen-check of the DEIR. This request was denied. However, as is obvious by her letter of August 20, 1991, Kate Shurson, Director of Planning, Chula Vista City School District, was allowed by the City to review a screen check DEIR. Further, though timely submitted, none of Mr. Wencke's comment letters on the March, 1991 draft EIR were included in the appendix to the August, 1991 draft EIR. Clearly, these acts constituted a violation of Circinus Corporation's right to equal protection under the law.

Recently, Circinus Corporation discovered that the City told a substantial potential commercial tenant for the site not to bother with the site, as the site was being condemned for a hospital. Not only is this evidence of unlawful preselection, but such action, typical of the City's unlawful condemnation activities over the past two years after making this project public, has severely depressed the market value of the site, resulting in monetary damage to my client. (See Klomping v. City of Whittier (1982) 9 Cal.3d 53 [city held liable for "precondemnation damages" for depressing the value of a target site].)

146

Perhaps the City's most obvious self-denial is the fact that its representatives have been actively working with existing tenants on the site to facilitate their relocation. Clearly, by encouraging and assisting tenants to relocate, the city has again not only preselected the Scripps project but continues to effect severe precondemnation damages.

More recently was the City's inadequate notice of the September 3, 1991 Special Meeting of the City Council and subsequent unlawful action. At this meeting, the City appropriated funds to further the condemnation proceedings, thus furthering the unlawful pre-selection of the Scripps project.

There have been numerous other equal protection, due process/notice and procedural violations which will be more fully outlined not in this letter but in legal proceedings to halt this unlawful project should it continue.

In conclusion, and as is obvious by the presence of like cases already on the books, by furthering this project, the City is in violation of the California Commercial, Residential and Redevelopment Codes, and the California Commercial/Residential Redevelopment proposal will rectify this situation.

Very truly yours,

WORLEY, SCHWARTZ, GARFIELD & RICE



JOSEPH A. SOLOMON

JAS:MC
CC List Attached
jr:tr

COMMENTS

RESPONSES

cc: Wayne Mancke, President
Circinus Corporation
Michael Jacobs, Vice-President
Circinus Corporation
Philip Hineshaw
A.D. Hineshaw Associates
Joseph Solomon, Esq.
(Circinus Corporation)
James J. Eischen, Jr., Esq.
(H Street Coalition)
Richard R. Freeland, Esq.
(First Interstate Bank)
Paul Peterson, Esq.
(Alvin Mairik)
Ralph Kostant, Esq.
(Scripps Hospital)
Bruce Boogard, City Attorney
Walter M. McLaughlin
Donald Reid, C.E.O., Chamber of Commerce
John Goss, City Manager
Chris Salomone, Community Development
Director
Will Hyde, Chairman
Town Centre Project Area Committee
Barbara Gilman, Chairperson
Design Review Committee
Robert Fox, Chairman
Resource Conservation Commission
Andrew B. Campbell, Administrator of
Planning, Sweetwater Union High
School District
Kate Shurson, Director of Planning
Chula Vista City School District
Dr. Lieveilyn Lieber

RESPONSES

COMMENTS

323 N. Street
P.O. Box 1527
Culver City, California 90230-1527
(818) 481-7200

Script Memorial Hospital
16181 45th Street
Van Nuys, California 91411
(818) 709-1234

RECEIVED
JUL 21 1968
Community Development Dept.

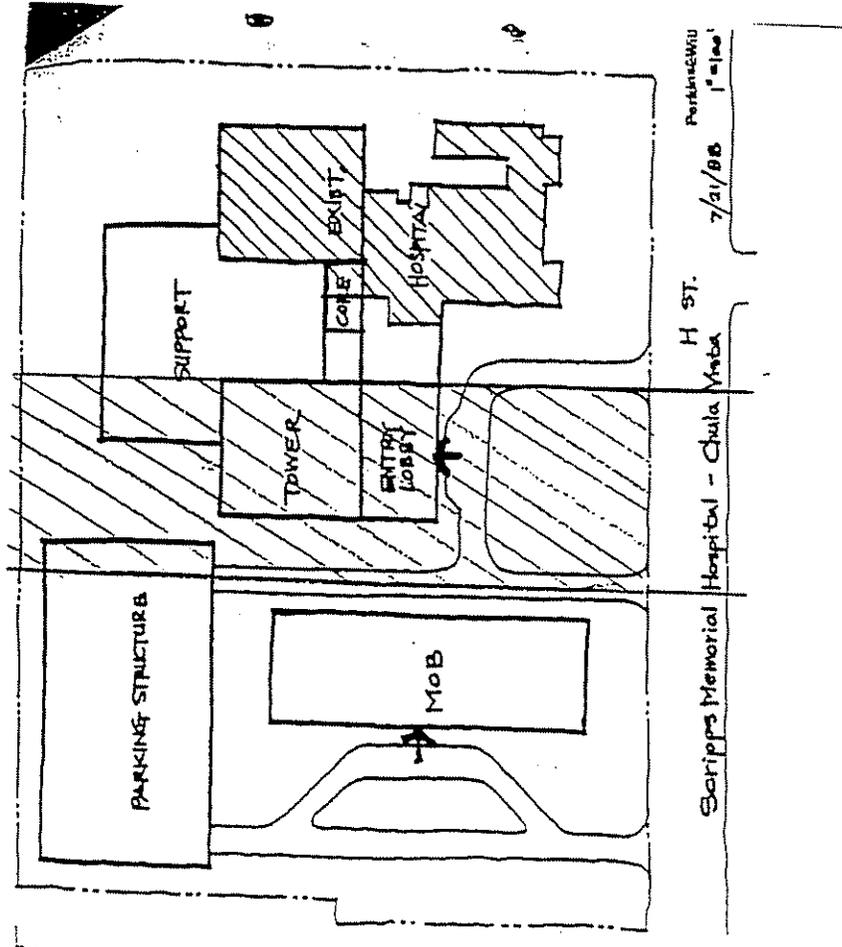
MEMORANDUM
Date: July 21, 1968
To: Paul Destrochers
Community Development Director
From: Jeff K. Bills
Re: Site Plan

JKB

Paul:
Attached, please find a site plan showing the extension of facilities to the west of the current hospital site.
As I mentioned, this is our first pass and reflects a sighting of those items essential to the expansion, growth and development of Scripps Memorial Hospital - Chula Vista.
Additionally, the size of buildings and circulation shown will no doubt change as we refine the plan.
If there are any questions, please call.

COMMENTS

RESPONSES



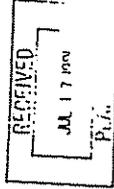
RESPONSES

147. Please refer to Item #1 of the responses to questions on the economic analysis included as Attachment A to these responses.

148. The comment refers to the May 23, 1989 Redevelopment Agency Statement which has been incorporated by reference into the DEIR. Supporting documentation for the Agenda Statement would need to be obtained from the Redevelopment Agency. A further discussion of the employment effect the expansion may have in the area is included in Item #4 of the responses to questions on the economic analysis included as Attachment A to these responses.

COMMENTS

A. D. HINSHAW ASSOCIATES
6136 Mission Gorge Road • Suite 111 • San Diego, CA 92120-3413
(619) 290-2264



July 16, 1991

Ms. Maryann Hiller
Environmental Review Coordinator
City of Chula Vista Planning Department
276 Fourth Avenue
Chula Vista, CA 91910

Re: Comments on EIR-90-07

Dear Ms. Hiller:

This letter is submitted on behalf of the owners of the existing Master ground lease for the property that is proposed to be redeveloped as an extension of Scripps Memorial Hospital. The following comments on the Draft EIR are submitted in response to the public review period as noted in the Notice of Completion.

PROJECT BACKGROUND

Page 11 (Ltr. 11): The EIR notes that the expanded facilities would encourage local residents to seek services within the City rather than going elsewhere. This infers that there is a deficiency of medical services in the City. Dr. Evelyn Liebar's letter in response to the Notice of Preparation notes that Chula Vista's medical needs are currently well served by Community Hospital, the Sharp-Research facility and the South Bay Medical Center. This section to be expanded to provide the reader with a broader view of the medical facilities in the City.

Such a discussion appears to be particularly relevant since Kaiser Hospital is planning to construct a hospital complex in the Chula Vista area of Chula Vista (see Attachment A). A discussion of the current and planned medical facilities throughout the City would be appropriate in the Cumulative Impacts section. The extent of the discussion cannot be determined with the limited information available to me. However, the City-wide setting for the proposed project should be provided to the public reviewing the EIR.

PROJECT DESCRIPTION

Page 10 (Ltr. 10): The Redevelopment Agency has concluded that the quality of jobs created and the multiplier effect of salaries and cost of operation would be greater with a hospital expansion than with a commercial development. This conclusion is stated without any evidence or reference to other documentation to support such a conclusion.

147

148

COMMENTS

RESPONSES

149

Item 14a of the Initial Study (see Appendix A) asks if people employed at the site would be displaced; the question is answered with an affirmative with the notation that existing uses would be displaced. An affirmative answer to the displacement question would indicate that there is a potentially significant social impact, yet the EIR contains no analysis to demonstrate whether or not the impact could be mitigated. This issue was also raised in a letter submitted by Dr. Eisevelyn Lieber in response to the Notice of Preparation.

EIRs serve the basic purpose of informing the public about potential significant environmental impacts and disclosing to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Simply stating a conclusion about the job creating advantages of the hospital expansion without a discussion of the effect of displacing existing commercial jobs is inadequate. The EIR should inform the public, and decision-makers, about the relative merits of the proposed project and retention of existing uses. Such a discussion is not found anywhere in the EIR.

150

Page 20 (2nd II). The EIR project description reports that the "potentially active" Chula Vista fault is located 2,300 feet to east of the project site. No further discussion of the potential significant effects of the fault on the proposed hospital is included in the EIR. The Initial Study (page 14, Appendix A) includes a note that geology/soils impacts have been analyzed in a soils report, but all of the potential geology impacts have been checked as "No".

There is an inconsistency between the EIR project description which describes a potentially active fault within 2,300 feet of the hospital site and the "No" responses in the Initial Study. Possibly the geology/soils report demonstrates that there is no potentially significant impact, but the EIR does not clarify that point. The final EIR should include an analysis of the potential earthquake hazard and, if required, mitigation measures.

151

LAND USE SECTION

PG. 25 (2nd II). The EIR states that the "declining economic viability of commercial uses on the project site is evidenced by the designation of the site as a blighted area in the Town Centre II Redevelopment Plan and by the closure of the 'Indoor Swap Meet' due to financial difficulties". This statement is unsupported by analysis included in the EIR or in the appendices.

We disagree with the conclusion that commercial uses of the property has a "declining economic viability". Our assessment is based on the fact that the first store, the Mark Naddy Car Clinic, Arby's, Theater, and Alvin's, all went to stay on the existing site and also on the fact that the Chula Vista Shopping Center is planning an additional expansion to add a \$2,000 sq. ft. Nervyn's Department Store and an 8-10 play theater. We also disagree that the project site should be designated as a blighted area. The California Redevelopment Law defines "blighted" as:

Conditions . . . causing a reduction of, or lack of, proper utilization of the area to such an extent that removal of the a serious physical, social, or economic burden on the community which cannot reasonably be expected to be reversed or alleviated by private enterprises acting alone.

The existing commercial uses do not "constitute a serious physical, social or economic burden on the community". Neither the 1989 Redevelopment Plan, nor the EIR, demonstrate that the existing facilities are a physical, social or economic burden on the community. Quite to the contrary, the businesses currently operating on the site produce more than adequate tax revenues to cover City costs of providing services to the site. Furthermore, there are no documented physical or social problems associated with the existing businesses.

149. Please refer to response to Comment #39.

150. The August 8, 1991 DEIR includes an analysis of geology and soils issues associated with project implementation (Section 4.7, page 103). The issue of the Chula Vista Fault is discussed in this section.

151. The referenced statement was not included in the August 1991 recirculated DEIR. However, the area was termed "blighted" by the Town Centre II Redevelopment Plan.

COMMENTS

RESPONSES

- 152.** Please refer to response to Comment #41. For a discussion on complementary land uses, see Item #6 of Attachment A to these responses.
- 153.** The referenced discussion was not included in the August 1991 recirculated DEIR.
- 154.** No uses are proposed as part of the project which would compete with other commercial uses in the central Chula Vista area. The Socioeconomic Considerations Report, as summarized on page 174 of the DEIR, concludes that employees generated by the proposed hospital expansion would have a beneficial effect on existing retail uses in the central Chula Vista area.

152

Page 10 (last 3): The EIR quotes that the Redevelopment Plan, "desires to use redevelopment tools to facilitate redevelopment of the (project) site with complementary uses (complementary to the redeveloped Chula Vista Shopping Center on H Street) to enhance the economic viability of the area". Not stated, but implied, in the EIR is that the hospital expansion would be a "complementary" use whereas a continuation of the existing retail uses would not be complementary uses. We disagree that the existing uses are not complementary to the Chula Vista Shopping Center.

Most modern master planned commercial areas that include a regional mall component also include a significant amount of support commercial retail development adjacent to the regional mall site. Very rarely is a major hospital facility planned next to a regional mall. If there were a positive synergistic effect from putting a hospital next to major regional retail tenants, then we would see evidence of this in the planning of new communities.

153

Page 10 (2nd 1): The EIR includes a conclusion of the Project Area Committee that increased commercial development on the site could negatively impact existing commercial businesses in the redevelopment area, including the recently renovated Chula Vista Shopping Center and the Third Avenue redevelopment area. This conclusion is also stated on page 11, 2nd ¶ of the EIR. There is no evidence in the EIR that warrants such a conclusion.

The Project Area Committee actually believed that the H Street corridor should be developed concurrent with the general plan. The reason that they did not oppose the hospital project is because no property owners in the immediate area voiced their objections. The PAC would have backed an objection at the time.

154

A recently completed EIR for the Palomar Trolley Center in the Montezuma Planning Area included a study that addressed the issue of potential adverse physical effects of a new shopping center on existing commercial activities. That study was performed to determine whether or not such adverse physical effects would, or would not, likely result from further commercial development.

In this EIR there is merely a conclusion that such adverse effects would occur without any documentation for such a conclusion. This is a grievous inadequacy of the Scripps Hospital Expansion EIR that must be corrected before a final EIR is certified by the Redevelopment Agency.

COMMENTS

RESPONSES

155

Para. 21 (last 31): The last sentence of this paragraph states that, "the project also implements one of the environmental goals of the Land Use Element of the General Plan". This is the only reference found in the EIR that refers to the environmental goals of the City Plans and policies.

One of the basic purposes of CEQA is to,

inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities (State CEQA Guidelines, Section 15002).

The Notice of Preparation (see Appendix A, page 2) states that, "the Land Use section (of the EIR) will describe the conformance of the project to the environmental goals of the City Plans and policies and the public and the proposed project. The EIR would list the environmental goals of the City and a discussion of how the proposed hospital expansion plan conforms to these goals.

The statement on page 31 of the EIR is not an adequate fulfillment of the environmental goals description anticipated by the Notice of Preparation. The decision-makers and the public are left uninformed about whether or not the project (i.e., the hospital expansion) conforms to the environmental goals of the City. This inadequacy of the EIR needs to be corrected before the Final EIR is certified as an adequate document (State CEQA Guidelines, Section 15090).

156

Para. 21 (2nd 11) (see also Initial Study, Item 14c): This section of the EIR discusses the Land Use Potential Impacts. The 2nd paragraph contains a brief discussion of potential impacts associated with the displacement of existing commercial tenants. The section concludes that there will be no significant impacts because the applicant is actively searching for relocation sites.

Section 15151 of the State CEQA Guidelines require that an EIR contain a sufficient analysis to provide decision-makers with information that enables them to make a decision while intelligently taking account of environmental consequences. While this EIR analysis need not be exhaustive, it should contain an analysis that is reasonable and feasible. The analysis contained in this EIR is far too brief and superficial to be considered even marginally adequate. A more complete analysis of the effects of displacement on the tenants is required.

157

Initial Study (Item 14d): Item 14d asks if the project could result in the substantial demand for additional housing or affect existing housing. A hand written entry indicates that existing residential uses will be displaced. The Notice of Preparation does not mention an analysis and the EIR does not identify any residences that would be displaced. Since the City initially determined that no residences would be displaced, the effects of the displacement should be addressed in the EIR.

VISUAL QUALITY

158

Notice of Preparation, P. 2: The Notice of Preparation states that the EIR will document the relationship of the project to the design guidelines for the project area. Included in the City Plans and programs. The visual quality section of the EIR contains an extensive discussion of the proposed architectural design and landscaping as well as a discussion of compatibility with the existing hospital architecture. What is lacking, however, is a discussion of the relationship of the proposed architectural design to the design guidelines. Consequently, the decision-makers with the public do not know if the project is consistent with adopted City guidelines. This omission needs to be corrected before the Final EIR can be considered complete.

155. Please refer to the response to Comment #s 42 and 43.

156. Please refer to the response to Comment #37.

157. Please refer to the response to Comment #44.

158. With the exception of a height limit of 100 feet in the City's urban core (stated on page 65 of the DEIR), there are no guidelines in the Town Centre II Redevelopment Plan or the central Chula Vista Area Plan to direct design of the proposed project. The City has an established Design Review Committee (DRC) to evaluate proposed projects from a design standpoint. The proposed hospital expansion project is subject to review by the DRC. As stated in response to Comment #13, DRC appears satisfied with the project design.

R E S P O N S E S

C O M M E N T S

159. Please refer to the response to Comment #45.

160. Please refer to response to Comment #91.

161. A section on construction traffic has been added to the August 1991 DEIR (pg. 82). Please also refer to response to Comment #49 for further discussion.

162. As stated on page 83 of the August 1991 DEIR, mitigation measures are provided that would require the widening of H Street with Phase Ultimate of the project when the impact to the intersection would occur. As stated on page 126 of the DEIR, cumulative traffic impacts are less than significant.

159 Initial Study, Item 13a1: This item asks if the project could result in a new light source or glare; it is checked as "None". The Notice of Preparation does not list light or glare as an issue to be addressed. Apparently, the City has determined that there will not be a significant effect, but there is no documentation in the EIR concerning such a conclusion. Since the potential for a light and glare effect has been identified in the Initial Study, the EIR should contain analytic information that demonstrates whether or not the potential exists. If there is, in fact, a potentially significant effect then appropriate mitigation measures should be identified.

160 TRAFFIC
Item 13a1, 13a2: The EIR notes that the increased range of medical services at Scripps Memorial Hospital as a result of the expansion would increase the flow of patients from outside the City into Chula Vista. This information is not reflected in the traffic analysis completed for the project.

161 Item 13a1: The project description indicates that several of the proposed expansion buildings would have basements. Although not explicitly stated in the Visual Quality section, the basements would apparently be included as a means of mitigating building height impacts. These basements would require the removal of a considerable quantity of earth from the project site. Truck traffic associated with the earth is not addressed in the traffic section. Since the earth operation could generate a considerable amount of truck traffic, the impacts associated with this operation should be included in the traffic analysis.

162 Traffic Study, Appendix B, Page 32, 33: This paragraph states that,
As a result of cumulative development (including the proposed Scripps Hospital Expansion), significant adverse unmitigable impacts may occur at the "H" Street/Fourth Avenue intersection prior to ultimate widening of H Street to six lanes.

Phase I and Phase II traffic mitigation measures are listed on pages 66 and 67 of the EIR. The widening of H Street is not included in the mitigation measures. The EIR then states that,
Impacts associated with project implementation would be mitigated to below a level of significance with implementation of the above measures.

THE CUMULATIVELY SIGNIFICANT, UNMITIGATED IMPACTS AT THE "H" STREET/FOURTH AVENUE INTERSECTION ARE NOT IDENTIFIED IN THE EIR. This is a serious defect in the Draft EIR that needs to be corrected in the final EIR.

COMMENTS

RESPONSES

163

If the Redevelopment Agency chooses to approve this project which contributes to cumulatively significant, mitigated impacts, the appropriate findings and statement of overriding significance would need to be made. Sections 15091, 15097 and 15099 of the State CEQA Guidelines contain the provisions relating to the required findings and overriding considerations. The "Notice of Determination (Section 15094) would also need to include a notation that the findings and statement of overriding consideration were adopted.

163. The comment is noted. Candidate Findings and a Statement of Overriding Considerations will be presented to decisionmakers acting on the proposed project.

164

Additional traffic analysis comments: A review of the traffic analysis technical study was completed by Monroy-Lopez Engineering. Their review discovered inadequacies in the methodology used in the EIR traffic study. A copy of their review is attached (see Attachment 9). The EIR traffic study needs to be revised as outlined in the attached letter.

164. Issues raised by the Monroy-Lopez Engineering study are addressed in the responses to Comment #s 86-94.

165

AIR QUALITY

Initial Study Item #1: The initial study has been checked to ensure that the project could result in significant emissions of odors, fumes or smoke. The air quality section of the EIR does not address these issues. This deficiency in the EIR needs to be corrected.

165. As stated on page 101 of the August 1991 DEIR, no air quality impacts would occur due to smoke, fumes or odor emissions because no waste or by-products are incinerated on-site nor will they be with the expansion.

166

CUMULATIVE IMPACTS

Page #3: The cumulative impacts section addresses traffic, parking, air quality and noise in an extremely brief manner. The State CEQA Guidelines defines cumulative impacts to include the effects of the proposed project and other "closely related past, present, and reasonably foreseeable probable future projects" (Section 15353). The EIR does not identify any reasonably related projects.

166. Table 9, page 126, is a cumulative projects list that discusses recently approved or proposed projects in the vicinity. These projects were incorporated in the cumulative effects analysis for the proposed project. Page 127 of the DEIR provides a discussion of cumulative effects on traffic and parking, air quality and noise, visual quality, schools and water conservation.

167

GROWTH INDUCEMENT

Page #6, last #1: The one paragraph discussion is deficient in addressing the growth inducement potential of the proposed project. A growth-inducing impact discussion is to include,

167. Please refer to the response to Comment #54.

168.

Please refer to the response to Comment #54.

168

(The way in which the proposed project could foster economic or population growth, either directly or indirectly in the surrounding environment (and the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively (Section 15126(g)).

¹⁰ Hospitals typically attract medically related business to the area surrounding the hospital such as pharmacies, doctor offices, etc. The EIR ignores the potential of an expanded hospital to stimulate additional growth in the area that could lead to indirect significant impacts (e.g., land use changes, traffic, public services, etc.).

COMMENTS

RESPONSES

169.

The recirculated August 1991 DEIR includes a comprehensive alternatives section (pp. 130-152) and contains detailed analyses of two alternatives suggested during public review of the previously circulated DEIR - the H Street Business Coalition Alternative and the Retail and Entertainment Alternative. The alternative sites analysis includes a discussion of issues associated with selecting a site for the proposed project in Chula Vista's Eastern Territories and a discussion of the issues associated with expanding the hospital to the north and east. From an environmental standpoint, as noted on pages 150 and 151 of the DEIR, the Reduced Density Alternative would avoid visual impacts identified for the proposed project. However, significant cumulative water impacts would still occur.

169. The Notice of Preparation states that the alternatives analysis will form a significant component of the EIR (Appendix A, Pg. 4). The brief discussion of a "No Project", "No G Street Access", "Retention of Existing On-site Restaurant Use" and "Alternative Site Analysis" cannot be considered a significant component of the EIR. The draft EIR circulated for public review is seriously inadequate in this respect.

The State CEQA Guidelines state that,

If there is a specific proposed project or a preferred alternative, explain why the other alternatives were rejected in favor of the proposal if they were considered in developing the proposal (Section 15126 (d) (1)). (Emphasis added).

Further, the Guidelines state that,

The key issues in whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. (Emphasis added).

170.

The referenced paragraphs are presented in the background section (pg. 24) of the DEIR. This discussion summarizes information included in the May 23, 1989 Redevelopment Agency Agenda Statement which has been incorporated by reference into the DEIR. This background section is intended to inform the reader and decisionmakers regarding the plan evolution process for the proposed project. It is not intended to present CEQA alternatives for the project. As stated in the DEIR, the selection of the Scripps project as the preferred alternative for the site occurred at the May 23, 1989 Redevelopment Agency staff meeting. This DEIR addresses this preferred alternative as the proposed project.

The Project Background section of the EIR indicates that six development alternatives have been analyzed by staff (page 10, let 5). The Redevelopment Agency selected the hospital as the "favored alternative". The following two paragraphs provide a conclusory statement as to why the Agency selected the hospital expansion rather than any of the other alternatives. The EIR text gives only the Agency's conclusions and does not provide the public with sufficient information to judge whether or not the Agency's conclusions are soundly based. This very brief discussion of why the other alternatives were rejected does not implement the basic purposes and policies of CEQA (see Sections 15002 and 15003 of the State CEQA Guidelines).

Even more perplexing to the reader is the brevity of discussion of the third alternative. The EIR text states that the alternative was included in response to a letter of response to the Notice of Preparation (i.e., see Mr. James J. Eischen, Jr. letter in Appendix A). The superficial analysis provided for this alternative certainly does not fulfill the commitment of the Notice of Preparation for "the alternatives analysis to form a significant component of the EIR". The draft EIR is deficient in this regard.

171.

Please refer to the response to Comment #23. This alternative was deleted from the August 1991 recirculated DEIR. This DEIR has been prepared for the Scripps Hospital Expansion project. As such, it need only analyze a reasonable range of alternatives. Because the Draft EIR was recirculated, and adequate information was available, the H Street Business Coalition and the Retail Entertainment alternatives fell within the reasonable range of alternatives and were included in the recirculated DEIR as alternatives.

COMMENTS

172

Para. 11 (2nd pt): This paragraph informs the reader that,

currently, proposals are being prepared by Aaby's in cooperation with Redicare and First Interstate Bank and Wayne Wencke. A variety of options are being considered. However, if these options are ultimately chosen, additional environmental review will be necessary to analyze the project impacts associated with these additional proposals. Project impacts contained in this document are for the Scripps Memorial Hospital only.

The draft EIR appears to have been prematurely prepared since other alternatives are being developed. If the current proposal, and the EIR, move forward through the review and approval process, the decision-makers and the public will not be fully informed.

5. The State CEQA Guidelines state that,

EIRs . . . should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment (Section 15004). (Emphasis added).

In contrast to many projects considered by public agencies, this EIR has been prepared too early in the process, about the decision-makers are to make an informed decision about the appropriate use of the project. Additional information is needed. Additional information especially important because: (1) the rationale for the projecting five alternatives is not adequately described in the EIR; and (2) other alternatives are currently being developed.

GROUNDWATER

The EIR project description notes that several of the proposed structures will have basements. Apparently, they were incorporated into the project as mitigation measures for visual quality impacts. Here the possibility of encountering groundwater been evaluated. The soils report noted in the Initial Study may contain information about the potential of encountering groundwater. If high groundwater is present, continual pumping may be necessary.

174

CONCLUSION

My comments concerning the adequacy of the EIR are included in this letter. Mr. Wencke has submitted letters that briefly touched on several of the points raised in this letter. I request that the comments in all letters be included in the Final EIR and fully responded to as required by the State and City CEQA Guidelines.

I also anticipate that the responses to the comments will require substantial new information to be added to the EIR, especially in the alternatives and growth-inducement sections. As a consequence, the Draft EIR would need to be recirculated for a public review to insure that the public is afforded an opportunity to consider, and comment on, the additional information.

Thank you for your consideration of these comments. If you have any questions concerning the comments, please contact me.

Sincerely,

Philip Hinshaw

Mr. Phillip Hinshaw

cc: Mr. Wayne Wencke
Mr. William J. Schwartz, Jr.
Mr. Tim Nader
Mr. Donald Reed
Mr. James J. Zierchen, Jr., Esq.
Mr. Richard M. Fraebel, Esq.
Mr. Andrew Shuren
Ms. Lisa Shuren
Dr. Elizabeth Lieber

Attachments
A San Diego Daily Transcript Article dated 5/1/91
B Monterey-Lepet Letter dated 4/16/91

File F:\philip\eir\scr\ppm1.206

RESPONSES

172.

Please refer to the response to Comment #125 for a discussion on alternatives. This paragraph was not included in the August 1991 recirculated DEIR.

173.

This DEIR analyzes the Scripps proposal as the proposed project, not any other alternative. Preparation of the DEIR was required in response to a formal CUP application submitted by Scripps to the City for the project. Please refer to the response to Comment #125 regarding the inclusion of other alternatives.

174.

The August 1991 DEIR includes a Geology and Soils section. Groundwater impacts are discussed in this section.

175.

Subsequent to circulation of the March 1991 DEIR, additional information was requested by the Planning Commission. The additional information was added to the DEIR and the DEIR was recirculated in August 1991 for further public review.

COMMENTS

RESPONSES

177. Please refer to the responses to Comment #s 90-94.

Monday-Lopez Engineering
civil engineering • traffic & transportation • parking design

April 16, 1991

Wayne Wencke
CIRCINUS CORPORATION
P.O. Box 883
Rancho Santa Fe, CA 92067

Review of the Scripps Memorial Hospital Expansion Project EIR

Dear Mr. Wencke,

I have reviewed the Draft EIR for the Scripps Memorial Hospital Expansion Project and found that the Traffic section is inadequate because it does not comply with the Notice of Preparation. Further, the Conclusions and Impacts are based on inaccurate trip distribution and trip generation data. Thus, the Traffic Study and the EIR need to be expanded and redone with correct trip distribution and trip generation data.

COMPLIANCE WITH THE NOTICE OF PREPARATION

Upon first reading the Traffic section I wondered why the study focused on intersections that are obviously not "critical"; of the four intersections analyzed only 4th Avenue at H Street is a congested intersection. However, the Notice of Preparation dated May 29, 1990, listed intersections and road segments that are of concern. All the intersections below should be analyzed especially the ones at the I-5 ramps. The scope of work for the traffic analysis included the following

ROAD SEGMENTS

- H Street
- F Street
- G Street
- Brookway
- Fifth Avenue
- Fourth Avenue
- Third Avenue

INTERSECTIONS

- H Street/ I-5 Ramps
- H Street/Fourth Avenue
- H Street/Third Avenue
- H Street/I-805 Ramps
- F Street/Broadway
- F Street/Fifth Avenue
- G Street/Fifth Avenue
- G Street/Fourth Avenue
- H Street/Fourth Avenue

The scope of work also states, "Specifically, pertinent safety and accident related data on existing roadway segments in the project vicinity will be analyzed." This was not complied with.

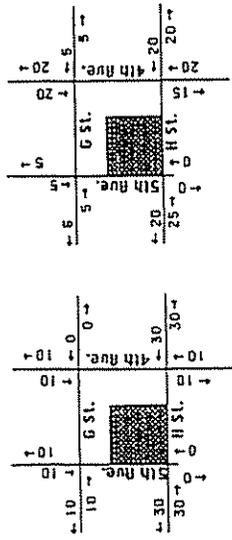
16123 Lyons Valley Road • Jemul, CA 91935 • 619/669-0920

RESPONSES

COMMENTS

Monroy-Lopez Engineering
 civil engineering • traffic & transportation • parking design

INCORRECT TRIP DISTRIBUTION DATA
 Page 12 of the Traffic Study states that the basis for the trip distribution and assignment was the existing turning movements counts. However, a breakdown by approach of the existing PM Peak Hour counts shown on Figure 6 shows a different trip distribution, see below.



WILLDAN DISTRIBUTION DISTRIBUTION BASED ON COUNTS

Because of the proposed median on H Street it would be very helpful to see all the trips assigned to the project driveways. Some proposed trip assignments might not be physically possible.

INCORRECT TRIP GENERATION DATA
 In determining Trip Generation rates for a Medical Office all the square footage within the project is used. Thus, it is inappropriate to separate Office and Storage areas as though they were unrelated to the Scripps project. In other words, the Storage rate is meant for rental self-storage businesses and the 25 times greater rate of 50 trips per 1000sf should be used.

Similarly, the Office rate is meant for commercial offices. Since the proposed office space is a part of the Scripps Memorial Hospital Expansion project, it should have the Medical Office trip generation rates applied to it. The Medical Office rate is 2.5 times greater than that for Office uses.

16123 Lyons Valley Road • Jamul, CA 91939 • 619/689-0926

RESPONSES

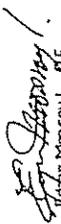
COMMENTS

Monroy-Lopez Engineering
civil engineering • traffic & transportation • parking design

It should be noted that it is very difficult to determine exactly what the proposed project entails in terms of additional square footages. It's as though the text in the EIR was written to obfuscate. The square footages used in the Traffic Study are simply shown in the Trip Generation summary (Table 3) without any explanation.

In conclusion, I believe that for the preceding reasons the conclusions in the Traffic Study and the EIR are not substantiated. The Trip Generation and the Trip Distribution are the basis for any Traffic Study. If these two items are incorrect (as in this case) then everything else that follows is invalid. This Traffic Study should be redone, including the additional analysis of truly critical intersections.

Sincerely,


Cesar Monroy L., P.E.
R.C.E. 27188, R.T.E. 1432

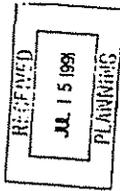


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COMMENTS

RESPONSES

178. Please refer to response to Comment #8. The text of the FEIR has been revised to state that discussions took place between the City and the hospital in 1988. The Notice of Preparation for the EIR could not be prepared until a formal application was submitted by Scripps for the project.



WORLEY, SCHWARTZ, GARFIELD & NICE
PLANNING AND ENVIRONMENTAL CONSULTANTS
1400 FIRST INTERSTATE PLAZA
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 591-0000
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July 10, 1991

Ms. Maryann C. Miller
Environmental Review Coordinator
Planning Department
City of Chula Vista
1001 Birch Avenue
Chula Vista, CA 92010

Re: Scripps Hospital Expansion
Dear Ms. Miller:

This item represents Mr. Wayne Wencks, President, one of the owners of the ground lease covering the property upon which the subject redevelopment project is planned. This letter is intended to comment upon the March 1991 Draft Environmental Impact Report ("DEIR") prepared for the above-referenced project. The EIR is inadequate and must be revised for the reasons stated below.

A. Background

The DEIR fails to provide the relevant history on the project site. Specifically, it fails to mention that, several years ago, the City of Chula Vista solicited proposals for redevelopment of the Target site. The City failed to notify Mr. Wencks, who upon untimely discovery of the redevelopment plans subsequently submitted a rushed development plan. Thus, the Scripps proposal was initially selected; however, no action was extended upon this proposal was subsequently selected. The concept of the current EIR process has been tainted by these events. The current EIR process has been selected "option." The DEIR is most clearly apparent when one notes that the City of Chula Vista first considered the hospital expansion in July of 1989. Yet, no notice was not distributed until May, 1990, almost two years later. The DEIR notes in correspondence dated June 28, 1990 submitted by Mr. Wencks, Jr. on behalf of RTH, Inc., this action prejudiced the requirement that an EIR be timely disseminated to allow project feasibility and meaningful environmental assessment. (Quintana v. Reg. 13000(b); HE. Ruffo Defense Commission v. Regents of the University of California (1978) 77 Cal.App.3d 30 (145 Cal.Rptr. 263).)

COMMENTS

RESPONSES

179. The project should not alter downtown retail focus. Please refer to response to Comment #39 for further discussion and Item #6 of Attachment A, responses to socioeconomic questions.

Maryann C. Miller
7/10/91
page two

B. Significant Environmental Impacts

The California Environmental Quality Act ("CEQA") is a means to force public agency decision-makers to document and consider the environmental implications of their actions. (Public Resources Code, sec. 21000-1; Land Use Handbook, 7th ed., pp. 10-11 (1972); 8 Cal.3d 347, 354 (1971); Land Use Handbook, 7th ed., pp. 763-768.) Host Importers, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives of feasible mitigation measures can substantially lessen such effects. (Elmira Club v. Gilroy City Council (8th Dist. 1990) 222 Cal.App.3d 50, 41 [271 Cal.Rptr. 393, 398].)

In the present case, the DEIR contains numerous blanket, unsupported statements regarding the desirability of the hospital expansion. Significant impacts must be addressed in depth.

1. Land Use/Community Character

The DEIR states that the impacts associated with the displacement of existing commercial facilities are not considered significant. CEQA identifies impacts normally deemed significant. (Guidelines, Appendix G.) Such impacts include action which disrupts or divides the physical arrangement of an established community. Expansion of the hospital will clearly alter the downtown area's retail focus.

Another significant impact is action which conflicts with established recreational uses of the area. The existing theater and roller rink will be replaced by expansion of the hospital onto the site. The DEIR further states that the applicant has identified relocation sites for two of the nine existing uses. (DEIR, p. 271.) Relocation sites for all of the existing uses should be identified and described in detail.

The DEIR points to the Chula Vista Shopping Center located across H Street, describing it as a "contiguous, well planned shopping center" which has "likely... attracted consumer traffic that may have previously visited the existing commercial complex located on the hospital expansion site." (DEIR, p. 271.) These statements are unsupported and do not constitute a detailed comparison of the existing commercial uses.

Rather, all of the existing commercial uses on the project site are merely labeled "poorly configured" and unable to accommodate "contemporary commercial uses." (DEIR, p. 25.) To the contrary, the existing businesses are going concerns. Further, the DEIR fails to consider the alternative of working with the owners of the ground leases and the existing businesses in order to improve any perceived deficiencies in the site's layout. The City of Chula Vista has even failed to contact the owners of the ground leases to explore the cost of acquiring the site property. In addition, Circinus Corporation, of which Mr. Wankle is President, is currently planning the redevelopment of the entire site. (Reference here is made to the preliminary plans submitted June 7, 1991 to the City by Circinus Corp.)

180. Please refer to response to Comment #37.

181. These statements were deleted from the August 1991 recirculated DEIR.

182. The referenced statements were deleted from the August 1991 recirculated DEIR. The alternative proposed by the Circinus Corporation, the Retail and Entertainment Alternative, is addressed in the August 1991 DEIR.

179

180

181

182

RESPONSES

183. No conflicts with adopted environmental plans and goals of the community have been identified in the EIR. Please refer to response to Comment #11 for further discussion.

184. This sentence was deleted from the August 1991 recirculated DEIR. The August 1991 DEIR has identified significant visual impacts associated with the medical office building height and the location of the proposed parking structure along Fifth Avenue.

185. The August 1991 DEIR contains a Geology section that addresses potential seismic impacts. Geology and soils considerations are discussed on pages 103-116 of the DEIR.

186. Rather than location of "a major health care center in an area with substandard air quality," the project proposes expansion of an existing hospital in downtown Chula Vista. Air quality in the vicinity of the project site is not considered to be substandard. As stated on page 99 of the DEIR, "air quality in Chula Vista is generally good with O₃ being the primary pollutant of concern."

No long-term air quality effects would be associated with implementation of the proposed project due to the fact that with proposed improvements, all roadways in the vicinity of the project would operate within the City of Chula Vista's threshold standard for congestion and the fact that the project represents infill development with concomitantly fewer and shorter trips than would occur if the project were located in a more outlying area. The DEIR (pg. 102) identifies short-term air quality impacts associated with construction activities. These impacts would be mitigated by implementation of standard dust control measures to a level of insignificance.

COMMENTS

183 a. Existing Land Use Designations
CEQA specifically provides that conflict with adopted environmental plans and goals of the community is a significant effect. The DEIR does admit that the proposed project is in conflict with the General Plan, as well as the adopted designations for the target site as retail use, and any hospital facility will require a Conditional Use Permit. (DEIR, p. 12.) However, the DEIR fails to explain that the discretionary nature of the permit heightens the standard of review required for the project.

184 b. Visual Quality
The six-story medical office building planned for Phase Ultimate is identified as being anticipated to be less of an impact in the future when it is constructed. The stated reason behind this conclusion is that other downtown projects will "tend toward higher multi-story buildings in the vicinity of a downtown urban community." (DEIR, p. 44.) This statement is entirely lacking any legitimate justification.

185 2. Geological considerations
The DEIR identifies the presence of a potentially active seismic fault one block from the proposed hospital. (DEIR, p. 20.) The DEIR admits that this fault should be considered in siting any critical facilities or high occupancy structures. However, no clear or compelling reason is given for disregarding this condition and siting a multi-story hospital expansion.

186 3. Traffic and Air Quality
Increase in traffic load in relation to the existing load and capacity of the street system is a significant environmental effect. The DEIR notes that the Scripps proposal would increase traffic in the area and would require improvement of the roadways. (DEIR, p. 66.) The DEIR acknowledges the concurrent effect on air quality but asserts the unsupported claim that this will be mitigated. Further, the DEIR later admits that the project will "generate traffic and associated additional air pollutants in the San Diego Area." (DEIR p. 81.) In addition, the DEIR fails to address the wisdom of locating a major health care center in an area with substandard air quality.

COMMENTS

RESPONSES

187

C. Alternatives

A DEIR must describe a range of reasonable alternatives to the proposed project that may feasibly obtain the project's benefits. (CEQA, sec. 21100(d), operative parts of each alternative.) (CEQA, sec. 21100(d), Guidelines, sec. 15126(d).) The discussion must focus on alternative(s) that probably eliminating adverse environmental impacts or reducing their level of insignificance. The DEIR must set forth information sufficient to permit a reasonable choice of alternatives to the decision makers. If the alternatives are considered infeasible, the DEIR should explain why. (Guidelines, sec. 15126(d); Lawrence Heights Improvement Association of San Francisco v. Regents of University of California (1988) 47 Cal.3d 376 [353 Cal.Rptr. 440].)

The DEIR merely makes a cursory identification of alternatives, stating "a variety of options are being considered." (DEIR, p. 11.) None of the DEIR fail to dispassionately evaluate the identified alternatives. The DEIR also fails to identify important logical alternatives. Following is a sampling of alternatives to the Scripps proposal:

188

1. Expansion of the hospital within its existing site. [The DEIR contains no analysis of the feasibility of reorganizing and refurbishing the existing facility. It merely claims that the hospital is currently operating at over 100% capacity. (DEIR, p. 07.)]

189

2. Expansion of the hospital up Fourth Avenue. [The lack of consideration of this alternative, coupled with a close look at the identity of the owners of this property as medical professionals suggest, under consideration to these owners in the Scripps proposal.]

190

3. Expansion of the hospital onto a different nearby site. [As it stands, the DEIR merely states that no other suitable sites exist. (DEIR, p. 90). However, reference is made here to correspondence dated June 21, 1991 submitted by Mr. Wencke, in which several specific sites are identified. The DEIR should provide a thorough analysis of these alternate sites, especially regarding land cost savings to Scripps.]

187.

The August 1991 DEIR offers alternatives that address identified environmental effects including the No Project and Reduced Intensity alternatives.

188.

As discussed in Item #1 of Attachment A to these responses to comments, Scripps Hospital reported that patients were regularly turned away for lack of space in 1989. The 4.7 acre portion of the project site that contains the existing hospital is fully developed with hospital uses and associated parking. Expansion of the hospital described in the DEIR would not be possible within the 4.7 acre site because the site is currently well utilized and there is no space for expansion.

189.

This alternative is discussed on page 152 of the August 1991 DEIR.

190.

The August 1991 DEIR includes a discussion of alternative sites including sitings in the Eastern Territories. The DEIR notes that developing the project at another site would not achieve the project objective of expanding the existing hospital facility. The three sites identified by Mr. Wencke, including Eastlake, Otay Ranch and Rancho del Rey are all located in the Eastern Territories. Please refer to response to Comment #130 for further discussion.

COMMENTS

RESPONSES

Maryann C. Miller
7/10/91
page five

191

Creation of a nearby campus site while maintaining the existing Chula Vista site. [This would allow the hospital to spend its resources establishing a primary facility rather than focusing on the relatively short-term development of the Chula Vista branch.]

192

No expansion of the hospital. [While the DEIR does briefly mention the alternative, the DEIR completely overlooks the overall need for the hospital expansion. Rather, in support of selecting the Scripps plan, the DEIR states that "scripps marketing consultants have indicated that Chula Vista has a low rate of residents seeking care in the City." (DEIR p. 11.) Reliance on this information is akin to having the wolf guard the henhouse. In addition, the DEIR lacks any objective backing in an analysis of the presence of other health care providers in the area. In addressing the existing emergency-impacted health care provider, Redicare Center, the DEIR declines to reply to the articulate comments submitted by Dr. Lisewallyn Lieber in his correspondence dated February 12, 1990, wherein Dr. Lieber presents a compelling argument that the expansion will create a "dinosaur" in downtown Chula Vista.]

193

In summary, the DEIR is severely flawed in its alternatives analysis. Any subsequent draft DEIR should contain a thorough analysis of project alternatives, including objective analysis supported by empirical data.

194

b. Impacts not addressed by the DEIR
CZQA identifies as a significant effect activities which result in the use of large amounts of fuel, water or energy, as well as the use of these resources in a wasteful manner. This is a potentially significant impact and should be addressed, especially in light of the existing drought condition. As discussed, the DEIR does not evaluate the actual need for the expanded hospital itself. Further, the DEIR does not address the anticipated water consumption of the proposed hospital, which project was planned for a escalation of the existing drought condition. For example, a water demand analysis should be performed.

195

In addition, the impacts of the hospital due to its unique status as a twenty-four hours a day, seven days a week operation should be addressed. These impacts include traffic, water consumption and use of other utilities.

191.

Please refer to response to Comment #130.

192.

A No Project Alternative is included in the DEIR. For further discussion of hospital facility demand, please refer to Item #1 of Attachment A, responses to economic questions.

193.

The August 1991 DEIR contains an expanded alternatives section when compared to the previous DEIR.

194.

The August 1991 DEIR contains a section on Water Conservation which includes a water demand analysis for the site. The proposed project is an expansion of an existing use in a fully urbanized area. Significant increases in energy and fuel consumption would not be associated with project implementation.

195.

The proposed project is an expansion of an existing use. The existing use currently operates as a 24-hour/day, 7 days a week facility, therefore no new impacts associated with operation times are anticipated. An analysis of environmental impacts associated with traffic and water usage of the project is included in the DEIR.

COMMENTS

RESPONSES

196

Creation of a public safety hazard is also a significant effect pursuant to CROA. The current hospital plan provides that emergency room access will be located off Fifth Avenue, adjacent to the junior high school and across the street from an elementary school. The DEIR fails to analyze the potential hazardous emergency response for emergency vehicles, as well as other emergency services, such as increased general hospital traffic, in such close proximity to these schools.

197

Further, the DEIR fails to discuss the potentially significant financial impacts of displacing the existing commercial facilities. Specifically, the DEIR lacks any empirical analysis of the loss of sales and income-tax-revenues resulting from the loss of jobs to its citizens. Reference here is also made to the comments of Lance Abbott, Community Development Specialist, in Attachment A, City Memorandum, in which Mr. Abbott points out the potential loss of revenues from the project due to the imprudence of constructing the new office building. In addition, the DEIR makes the unrounded (and "upside") statement that "it is likely that the mall (across "H" street) has attracted consumer traffic that may have previously visited the existing commercial complex located on the hospital expansion site." (DEIR, p. 27.) This "competing business" argument is highly inequitable and violates Mr. Wencke's constitutional right to equal protection under the law.

198

In addition, it is our understanding that the mall across "H" street is the subject of the incremental nature of this project as it relates to the proposed Scripps expansion was not addressed in the DEIR.

199

The DEIR notes that Scripps purchased Bay General Hospital in 1966 at a time when Bay General was experiencing severe financial hardships. (DEIR, p. 7.) It is disclosed that Scripps compensated the City of Chula Vista for outstanding bonds against the hospital. While this action by Scripps is commendable, it does not merit the City's unusually strong position in favor of the proposed expansion.

196.

As shown on Figure 24 of the DEIR, emergency entrance to the proposed project could be taken from Driveway A, F and E. The traffic analysis states that approximately 15-20 emergency trips are expected daily. This is approximately 5-6 emergency trips per driveway per day. With an emergency trip occurring approximately once every 4 hours, safety risks to school children associated with emergency traffic is considered below significance.

197.

Please refer to Item #2 of Attachment A, responses to questions on the economic report for a discussion on estimated tax revenue. The referenced statement from page 127 of the previously circulated DEIR was deleted from the August 1991 recirculated DEIR.

198.

A separate EIR is being prepared for the Chula Vista Mall Expansion. Phasing associated with that project will be addressed in the mall expansion EIR.

199.

The comment is noted. It does not address the sufficiency or adequacy of the EIR and no response is necessary.

COMMENTS

RESPONSES

200. Please refer to response to Comment #'s 14 and 123.

200 Perhaps the most glaring abuse of resources identified in the DEIR is the two-phase approach of the Scripps Coastal Hospital. Scripps Hospital suggests the need for the entire 6.9 acre site, while utilizing only a portion of the land for ten to fifteen years. This plan also lacks any guarantee that, once in possession of the land, Scripps will follow through with Phase Ultimate and develop the remaining majority of the site. For example, no funding source is identified for the major improvements to infrastructure which will be necessitated by Phase Ultimate. This is especially relevant to the California law financial impact of the project, which is a succession of smaller projects, each of which by itself, causes significant impacts. (See, e.g., 15063(s)(1): Citizens Association for the Development of Bishop Area, v. County of Inyo (1983) 171 Cal.App.3d 331, 165-166 [322 Cal.Rptr. 247].)

Z. Conclusion

The flavor of the DEIR is one of extreme bias in favor of the Scripps expansion. Instead of dispassionate analysis, the DEIR merely adopts wholesale the "uncorroborated" analysis offered by Scripps Hospital. This is especially evident in the spirit of CEQA and its policies of mandating an objective analysis of a project's environmental impacts.

Thank you for your consideration. Please do not hesitate to contact the undersigned to discuss this matter.

Very truly yours,

WOLFEY, SCHWARTZ, GARFIZEL & RICE



WILLIAM G. SCHWARTZ, JR.

cc: Wayne Wencke, President, Circinus Corp.
Tim Kader, Mayor
Donald Reed, CEO, Cham. of Com.
James Kischan, Jr., Esq.
Andrew B. Campbell, Admin. of Plan. S.U.H.S
Kate Thurston, Dir. of Plan. C.V.Z.B.

COMMENTS

WAYNE WENCKE
P.O. Box 93
Rancho Santa Fe, CA 92087
(619) 566-7503
Fax (619) 566-3118

April, 24 1991

HAND DELIVERED
Ms. Maryann C. Miller
Environmental Review Coordinator
City of Chula Vista
276 Fourth Avenue
Chula Vista, California 91912

RE: Case #EIR 90-07 (Draft EIR Scripps Memorial Hospital expansion)

Dear Ms. Miller,

I am writing on behalf of the ownership of the Master ground lease for the entire site. I have reviewed the Scripps Hospital expansion draft environmental impact report ("EIR") and have found it to be rife with factual deficiencies in a number of areas. You have also received correspondence from various citizens, educational and government agencies opposed to the proposed EIR. Rather than write each and every example from these multiple page letters, I will suffice to say that I strongly echo the sentiments over these issues previously raised in these public documents. I hereby request that all of these issues be fairly and completely presented and evaluated in a proper EIR.

201

Alternative Uses

Requirements of the California Environmental Quality Act (CEQA), plus redevelopment law and proposals for the site. The ownership interests as well as tenants on the site have put forth alternative proposals for completely different site configurations. These include retail only as well as mixed use. Both types of alternative proposals have been additionally submitted by me. The former and possibly a permutation of the latter would not require a conditional use permit, general plan amendment and therefore no formal Environmental Impact Report, if any. These minimal impact alternatives must be completely presented and analyzed in a complete and unbiased report.

202

Traffic and Parking (Section 4.3 Scripps draft EIR)

I have included with this correspondence a letter of analysis from Edgar Monroy of Monroy-Lopez Engineering. Mr. Monroy has approximately eighteen years of experience with traffic analysis work. His letter identifies a number of different areas of deficiency including omission of road way segment and intersection study information required in the EIR, omission of accident and safety data. He also indicates that there has been an omission of trip generation information and mis-application of same. In short, Mr. Monroy believes that the traffic analysis section is inaccurate and invalid in identifying the true adverse impact. All the factual information should be completely disclosed and analyzed including all missing information.

203

Toxicity (Health, Section 4.5 Scripps draft EIR)

Additionally, the toxic section does not address the asbestos on site. We have completed sampling of the site and have found asbestos present in a number of areas on site. A certified technician must complete an analysis of the site and the results must be fully addressed and appropriate abatement measures identified.

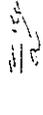
Conclusion

The aforementioned is a brief summary of the issues that were either completely omitted from the draft EIR or were manipulated in a way that obscures certain unavoidable impacts. Presenting a significantly negative impact as an acceptable or negligible impact is not the function of the CEQA process or the purpose of preparing a draft EIR.

The EIR must address all issues fully and completely regardless of their particular benefit to the applicant.

I hereby request that the EIR be revised and corrected to reflect all of the issues raised previously. I look forward to an unbiased, fair and equal treatment of all of these alternatives and issues. This corrected report would much more closely identify the actual impacts and options to the constituents of the city, tenants and ownership interests in the property.

Sincerely,



Wayne Wencke

cc: Mr. Donald McCrelic
Mr. James P. Peiter

RESPONSES

201. The Retail and Entertainment Alternative is fully analyzed in the DEIR.
202. Please refer to responses to Comment #s 90-94 for responses to the Monroy-Lopez Engineering letter.
203. A discussion of potential impacts and mitigation measures associated with the possible presence of asbestos within certain structures on the project site is presented on page 93 of the DEIR.
204. The issues raised by this letter have been addressed in the August 1991 recirculated DEIR.

RESPONSES

COMMENTS

205. Please refer to response to Comment #S 90-94.

Monroy-Lopez Engineering
civil engineering • traffic & transportation • parking design

April 16, 1991

Wayne Wendke
CIRCINUS CORPORATION
P.O. Box 883
Rancho Santa Fe, CA 92067

Review of the Scripps Memorial Hospital Expansion Project EIR

Dear Mr. Wendke,

I have reviewed the Draft EIR for the Scripps Memorial Hospital Expansion Project and found that the traffic section is inadequate because it does not comply with the Notice of Preparation. Further, the conclusions and impacts are based on inaccurate trip distribution and trip generation data. Thus, the Traffic Study and the EIR need to be expanded and redone with correct trip distribution and trip generation data.

COMPLIANCE WITH THE NOTICE OF PREPARATION
Upon first reading the Traffic section I wondered why the study focused on intersections that are obviously not "critical"; of the four intersections analyzed only 4th Avenue at H Street is a congested intersection. However, the Notice of Preparation dated May 29, 1990, listed intersections and road segments that are of concern. All the intersections below should be analyzed especially the ones at the I-5 ramps. The scope of work for the traffic analysis included the following

- | | |
|----------------------|------------------------|
| ROAD SEGMENTS | INTERSECTIONS |
| H Street | H Street/ I-5 Ramps |
| F Street | H Street/Fourth Avenue |
| G Street | H Street/Third Avenue |
| Broadway | H Street/I-805 Ramps |
| Fifth Avenue | F Street/Broadway |
| Fourth Avenue | F Street/Fifth Avenue |
| Third Avenue | G Street/Fifth Avenue |
| | G Street/Fourth Avenue |

The scope of work also states, "Specifically, pertinent safety and accident related data on existing roadway segments in the project vicinity will be analyzed." This was not complied with.

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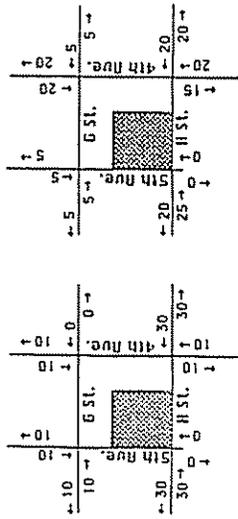
RESPONSES

COMMENTS

Monroy-López Engineering
 civil engineering • traffic & transportation • parking design

INCORRECT TRIP DISTRIBUTION DATA

Page 12 of the Traffic Study states that the basis for the trip distribution and assignment was the existing turning movements counts. However, a breakdown by approach of the existing PM Peak Hour counts shown on Figure 6 shows a different trip distribution, see below:



WILLDAN DISTRIBUTION DISTRIBUTION BASED ON COUNTS

Because of the proposed median on H Street it would be very helpful to see all the trips assigned to the project driveways. Some proposed trip assignments might not be physically possible.

INCORRECT TRIP GENERATION DATA

In determining Trip Generation rates for a Medical Office all the square footage within the project is used. Thus, it is inappropriate to separate Office and Storage areas as though they were unrelated to the Scripps project. In other words, the Storage rate is meant for rental self-storage businesses and the 25 times greater rate of 50 trips per 1000sf should be used.

Similarly, the Office rate is meant for commercial offices. Since the proposed office space is a part of the Scripps Memorial Hospital Expansion project, it should have the Medical Office trip generation rates applied to it. The Medical Office rate is 2.5 times greater than that for Office uses.

16123 Lyons Valley Road • Jomol, CA 91935 • 619/669-0928

COMMENTS

RESPONSES

Monroy-Lopez Engineering
civil engineering • traffic & transportation • parking design

It should be noted that it is very difficult to determine exactly what the proposed project entails in terms of additional square footages. It's as though the text in the EIR was written to obfuscate. The square footages used in the Traffic Study are simply shown in the Trip Generation summary (Table 3) without any explanation.

In conclusion, I believe that for the preceding reasons the conclusions in the Traffic Study and the EIR are not substantiated. The Trip Generation and the Trip Distribution are the basis for any Traffic Study, if these two items are incorrect (as in this case) then everything else that follows is invalid. This Traffic Study should be redone, including the additional analysis of truly critical intersections.

Sincerely,


Juan Monroy L., P.E.
R.C.E. 27188 R.T.E. 1432



16123 Lyons Valley Road • Jamul, CA 91935 • 619/669-0928

COMMENTS

RESPONSES

CIRCINUS CORPORATION

P.O. Box 883, Rancho Santa Fe, CA 92087



June 21, 1991

Ms. Maryann Miller
Contract Planner
City of Chulo Vista
276 Fourth Avenue
Chulo Vista, CA 92010

RE: EIR proposed Scripps Hospital Expansion

Dear Maryann,

As indicated in my letter dated June 5, 1991 I am writing this letter to inform you of a few areas to completely analyze as alternate locations for a Scripps Hospital expansion.

206

There are three different developers that would be willing to accommodate a hospital. They are as follows:

- 1) Eastlake Development - 619/421-0127
Contact: Guy Livingston
They have available land at \$7 - \$10/p.s.f.
2) Baldwin Company/Otay Ranch 619/259-2900
Contact: Ken Kilkenny
They have available land to plan for a hospital
3) Rancho Del Rey 619/696-8325
Contact: Jerry Keeney
They have same land available.

207

It is fair to assume that sites with Baldwin and Rancho Del Rey will have a similar range of price per square foot. It is important to note that these land costs are approximately half of the cost for the proposed expansion site.

The hospital expansion and medical office structure costs are the same whatever ever they are built. The phase II (ultimate) parking structure cost may potentially be more than the cost of the land for horizontal surface parking at an alternate site. The hospital could plan for a new campus setting for the present and future. Additionally, they may maintain the existing hospital site with a more appropriate redevelopment of the hospital. Clearly, these alternatives would be for more environmentally sound with appropriate strategic planning.

208

206. Please refer to response to Comment #190 for a discussion on the alternative sites analysis presented in the DEIR.

207. The comment is noted. It does not reflect on the adequacy or sufficiency of the DEIR and no response is necessary.

208. As noted in discussion of alternative sites presented on pages 151 and 152 of the DEIR, implementation of the proposed project at an alternate site in an existing undeveloped area could result in impacts to biological and cultural resources which would not occur with implementation of the project as proposed. From the standpoint of direct impacts to physical resources and impacts associated with isolation and fragmentation of sensitive habitats, infill development is generally environmentally preferred over development in outlying vacant areas.

COMMENTS

JUN-27-91 THU 13:57: BUREAU OF COMMUNITY DEVELOPMENT TEL: 404-526-6313 FAX: 404-526-6314

RESPONSES

CIRCINUS CORPORATION

209 An alternate site expansion will preserve the environmental integrity of the community (commercial) around the proposed expansion site. This will increase the inertia for continued re-development of complementary commercial uses in the core area. The required mitigation measures for the Phase II (ultimate) expansion are extremely cost prohibitive and impractical to implement. An alternate site hospital expansion makes all of these issues manageable and their outcomes certain from the beginning.

I would also like to address some related issues.

210 First, I received your certified letter dated May 27, 1991 on June 6, 1991. You asked for certain documents for a proposed site plan for our re-development for the site. All of these documents were hand delivered to you the next day (June 7, 1991) in our meeting with Fred Kossman.

Second, please send me the following:

- 1) A copy of the EIR and related correspondence for the original re-development of the shopping center across the street from our site.
- 2) A copy of the EIR and related correspondence for the second expansion "Mervyn's" of the same shopping center.
- 3) a) The breakdown by type, number of square feet, and number of beds for each hospital use in the existing, Phase I and Phase II hospital configuration. Some examples would be ER, ICU, 2nd CU, OB/Gyn, Radiology, etc.
b) Please list, in addition, the amount of utilization for a period of the last six months in 1991 as well as the same six months in 1989.
- 4) The Fourth Street expansion alternatives that you, the city or redevelopment agency have considered or shall consider for the hospital needs.

Scriptix has stated they they have considered these options. Whether the city has considered their alternatives or have analyzed their own (as should be done), we would like to see the results of these analyses.

I look forward to receiving your (or the redevelopment agency's) analysis of these important issues. I expect that this information will also be included in the draft EIR offer all parties have had adequate time to see this additional information and make comments about it prior to its inclusion in the draft EIR.

Last, our company has retained William J. Schwartz of Wootley, Schwartz, Garfield and Rice, Joseph Solomon is another attorney of the same firm. We are sharing some of the work on this matter. They will be contacting you directly. We will have further comments to make concerning the proposed Scriptix Hospital expansion.

I look forward to your cooperation in identifying the other alternatives which will ultimately best meet the needs of the community.

Sincerely,

Sincerely,


Wayne Wencke
President

cc: Tim Nader, Mayor
Donald Reed, CEO, Cham. of Comm.
Chris Salomone, Comm. Dev. Dir.
Walter Eichen, Jr., Esq.
William J. Schwartz, Jr., Esq.
Andrew B. Campbell, Admin. of Plan. S.U.H.S.
Kate Shotton, Dir. of Plan., C.V.E.S.

209. Please refer to Item #6 of Attachment A for a discussion of complementary land uses. The applicant has agreed to all mitigation measures as they appear in the recirculated DEIR.

210. The comment is noted. It does not address the sufficiency or adequacy of the DEIR and no response is necessary.

COMMENTS

RESPONSES

The following letter was received by the City of Chula Vista on September 30, 1991, five days following the September 25, 1991 closure of the public review period for the DEIR. The letter is included in these responses to comments, however, in order to provide a complete administrative record for the FEIR.

WORLEY, SCHWARTZ, GARFIELD & RICE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1800 FIFTH AVENUE, SUITE 1500
SAN DIEGO, CALIFORNIA 92101
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RECEIVED
SEP 30 1991

PLANNING

September 27, 1991

Susan Fuller, Chairperson
Planning Commission
City Planning Department
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

Re: Scripps Hospital Expansion

Dear Chairperson Fuller:

I represent Circinus Corporation, Wayne Wencke, President, one of the owners of the lease covering the property upon which the subject redevelopment project is planned.

This letter constitutes a request to reconvene the Town Centre Project Area Committee, for the city to respond to the economic factors and project solicitation process, and for the city to respond to all of the other numerous deficiencies in the EIR, with the ultimate goal being for the city to elevate the Circinus Commercial/Retail project to its proper status as the lead project.

1. These matters must be considered. To preface this letter, undoubtedly, city staff will again attempt to slam the door on my client, alleging that you should not even consider this issue, the public review period was closed on September 25, 1991. However, these are not new matters but rather comments on further procedural abuses.

Also, do not let city staff convince you that just because public review is closed I cannot raise these issues. I am forced to raise these issues to preserve my right to effectively challenge this EIR in court. (Pub. Res. Code sec. 21177.) Your serious consideration of these matters will not only benefit my client but could prevent the city from incurring further liability.

211.

As noted above, the letter of comment was received following closure of the public review period for the DEIR. It has been included in the response to comments package for the FEIR in order to provide a complete administrative record.

211

SEP 27 1991 10:51 AM '91

COMMENTS

Susan Fuller
September 27, 1991
Page 2

2. Illegal PAC Meeting

At the hearing of your commission on September 25, 1991, I discovered that the Town Centre project Area Committee had recommended certification of the EIR at its meeting of September 5, 1991. This was the first notice I received of this action. In fact, I was not even notified of this hearing, in direct violation of the law. (Gov. Code sec. 4924.1, see correspondence dated September 9, 1991 from myself to City Attorney Bruce Boogard.) Obviously their recommendation should not be considered, as Circinus was not properly notified at the hearing.

In support, the improperly notified Resource Conservation Committee hearing on September 9, 1991 (where the RCC voted to recommend certification of the EIR) was, upon discovery of improper notice, reconvened and the matter reheard on September 23, 1991. After hearing from Circinus, the RCC elected to rescind their recommendation and study our submitted written objections. Not only is it therefore possible that the PAC would have acted similarly, but it is extremely inconsistent to reconvene the RCC meeting because of improper notice but not reconvene the PAC meeting. The remedy here is to reconvene the PAC meeting to consider this matter. I thus request you ensure that this be accomplished.

RESPONSES

212. The comments are noted. They do not reflect on the sufficiency or adequacy of the DEIR and no response is necessary. It should be noted that the Project Area Committee (PAC) did not recommend certification of the EIR at the September 5, 1991 meeting. As stated in the minutes, a motion was carried to forward the EIR to the Planning Commission with comments from the PAC.

COMMENTS

RESPONSES

213.

The analysis presented in the DEIR concludes that economic effects associated with relocation of existing businesses on the project site would not result in a significant physical change to the environment for two reasons: 1) businesses similar to those that would be eliminated from the project site are currently located within the vicinity of the proposed project and therefore loss of on-site businesses would not result in significant impacts to community character; and 2) in general, it is anticipated that the existing on-site businesses would be relocated within the central Chula Vista area and would continue to provide a similar retail element in the project vicinity. (Please refer to response to Comment #37 for a discussion of the current status of relocation efforts. Please refer also to the Introduction to the FEIR as well as Item #2 of Attachment A to these responses for a discussion on estimated tax revenues and Item #6 for a discussion on complementary land uses.

3. Economic and Project Solicitation

After our presentation at the hearing, City staff made two improper allegations to which, in my continuing attempts to correct this situation, I must respond. City staff is in essence telling you that two of our important objections to the Draft EIR are not even within the scope of your review.

A. Economic Impacts

First, City staff was telling you that economic impacts are beyond the scope of CEQA. This is completely untrue. (Pub. Res. Code Secs. 21000, 21191; Guidelines sec. 15131(a); Citizens for Quality Growth v. City of Mount Shasta (1988) 198 Cal.App.3d 433; Citizens Association for Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151.) In the Bishop case, the court explained that:

"The lead agency shall consider the secondary or indirect environmental consequences of economic . . . changes . . . Such an interpretation is unequivocally consistent with the mandate that secondary consequences of projects be considered . . . Indeed, . . . the physical change [caused by economic . . . effects of a project] may be regarded as a significant effect in the same manner as any other physical change resulting from the project . . ." (Bishop, supra, 172 Cal.App.3d at 170.)

Therefore economics must be considered if they cause any physical change. A healthy environment is not free. The City of Chula Vista cannot accurately claim that a loss of over \$700,000 per year in revenues will not cause a physical change to the environment. (See economic analysis submitted September 23, 1991 by Michael Jacobs, where he concluded that the Scripps Expansion will result in decreased yearly revenues of between \$430,195 and \$993,450.) Further, there may be a more significant impact to the region. Scripps' in-lieu tax payments are merely robbing Peter to pay Paul.

In the subsequent case Mount Shasta, the court recognized the Bishop court's holding and stated:

"The potential economic problems caused by the proposed project could conceivably result in business closures and physical deterioration of the downtown area. Therefore, on remand, City should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (Mount Shasta, supra, 198 Cal.App.3d at 446.)

City staff claims that economics must be considered only if "physical deterioration" will result. That is a misinterpretation of this passage. Rather, physical deterioration is a more example of physical changes effected by an economic impact. Further, the Scripps Expansion may result in some deterioration of downtown due to the loss of retail "synergy." (Reference testimony presented at September 25, 1991 Planning Commission hearing.)

COMMENTS

RESPONSES

214. Please refer to response to Comment #140. The environmental review process for the proposed project began after a formal application for the project was submitted to the City of Chula Vista. The current environmental review process has been ongoing for more than a year.

B. EIR EXCESSIVE

City staff also asserted that it would not respond to my challenge to the redevelopment and project solicitation process, as this too was beyond the scope of CEQA. This is absurd. An EIR cannot be considered in a vacuum as purely an engineering document. The genesis of a project is the very foundation of, and is inseparable from, the EIR; an EIR must be timely disseminated to allow project flexibility and meaningful environmental assessment. (Guidelines sec. 15004(b); DL-SURO-DKANSAS Commissioner v. Regents of the University of California (1978) 77 Cal.App.3d 70.)

Rather, City staff would have you ignore the fact that, in 1988 when this project was made public, my client, although an owner on the site, was unlawfully shut out of the redevelopment process. Rather, the Scripps project was a "done deal" before the EIR was even begun. Not only was this accomplished in direct violation of state and local redevelopment law, this action clearly violated CEQA.

You must consider these comments, despite the fact that City staff will scream that public review is closed. This is a mere back door attempt by City staff to once again abuse the process in order to continue railroading this project through. You must consider these matters not only to prevent the City from incurring further liability, but based on the fact that one of my basic challenges to this Draft EIR is that the City of Chula Vista has, from the start, and in direct violation of my client's Fifth Amendment due process rights, twisted and abused not only redevelopment law but the entire EIR process. This challenge, by its nature, confronts such procedural abuses.

COMMENTS

RESPONSES

215. Please refer to responses to Comments 134 and 145 regarding responses to comments on the previously circulated DEIR. The issues raised in this comment are discussed on the following pages of the DEIR:

- alternative sites (pages 151 and 152)
- alternative uses (pages 24-25 and 132-151)
- toxics (pages 91-93)
- sewage (pages 119-124)
- noise (pages 85-90)
- project need (Appendix G - Socioeconomic Considerations Report and Item 1, Attachment A to these responses).

4. INADEQUATE RESPONSES

Again, it is difficult to separate process from substance. For example, the EIR has failed to respond to numerous other matters raised in the comment letters, violating CEQA procedural requirements, yet in addition the comment letters point out serious flaws in the EIR itself. These flaws include but are not limited to alternative sites, alternative uses, toxics, sewage, noise, and importantly the overall need for an expanded hospital. Enclosed for your review are comment letters from my file regarding this project. Please review each one to ensure that the EIR has properly considered those matters.

215

Conclusion

Thank you for your consideration. I request your Commission take charge of correcting this matter by ensuring that:

216

1. The Town Centre Project Area Committee reconvenes to reconsider this matter based on testimony from Circinus Corporation.
2. The City respond to the economic factors and project solicitation process, and
3. The City properly respond to all other matters raised in the comment letters.

I am confident that after properly considering these matters, the City will conclude that the proper remedy for this situation is nothing short of elevating the Circinus Commercial/Retail proposal to its proper status at the lead project. This is clearly the proper solution not only for my client but for the city as well.

Very truly yours,

MORLEY, SCHWARTZ, GARFIELD & RICE



JOSEPH A. SOLOMON

JAS:mc
ENC.
cfr-108

216. The comments are noted. They do not reflect on the sufficiency or adequacy of the DEIR and no response is necessary.

RESPONSES

COMMENTS

Susan Fuller
September 27, 1991
Page 6

cc w/o enc:

- Wayne Wencke, President
Circinus Corporation
- Michael Jacobs, Vice-President
Circinus Corporation
- Philip Hinesav
A.D. Hinesav Associates
- James J. Eischen, Esq.
(H Street Coalition)
- Richard R. Freland, Esq.
(First Interstate Bank)
- Matthew Peterson, Esq.
(AIVin Mainik)
- Ralph Kostant, Esq.
(Scripps Hospital)
- Richard Rudolph, Esq.
(City of Chula Vista)
- Tim Nader, Mayor
- Donald Read, C.E.O.
Chamber of Commerce
- John Goss, City Manager
- Chris Salmons, Director
Community Development Department
- Maryann Miller, Environmental Review Coordinator
Planning Department
- Will Hyde, Chairman
Town Center Project Area Committee
- Robert Fox, Chairman
Resource Conservation Committee
- Barbara Gilman, Chairperson
Design Review Committee
- Andrew B. Campbell, Administrator of Planning,
Sweetwater Union High School District
- Kate Shurson, Director of Planning
Chula Vista City School District
- Dr. Llewellyn Lieber

COMMENTS

RESPONSES

217. The letter of comment is noted. It does not reflect on the sufficiency or adequacy of the analyses included in the DEIR and no response is necessary.

WORLEY, SCHWARTZ, GARFIELD & RICE
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PATRICIA A. BERRY
JOSEPH A. SCHWARTZ

September 27, 1991

Mill Hyde, Chairman
Town Centre Project Area Committee
803 Vista Way
Chula Vista, CA 91911

Re: ZIR 90-07 (Scripps Hospital Expansion)

Dear Mr. Hyde:

I represent Circinus Corporation, Wayne Hencke, President, one of the owners of the ground lease covering the property upon which the subject redevelopment project is planned.

At the September 25, 1991 Planning Commission hearing, I discovered that the Town Centre Project Area Committee had recommended certification of the EIR at its meeting of September 5, 1991. This was the first notice I received of this action. In fact, I was not even notified of your September 5, 1991 hearing. Rather, my client received notice of the September 5 hearing on September 6, 1991. This improper notice was in direct violation of the law. (See Gov. Code sec. 54934.1.)

Therefore I hereby request you to reconvene the Town Centre Project Area Committee to rescind its recommendation to certify the EIR and hear from Circinus regarding this matter.

In support of this request, I point out that the improperly noticed Resource Conservation Committee hearing on September 9, 1991 (where the RCC voted to recommend certification of the EIR) was, upon discovery of improper notice, reconvened and the matter reheard on September 13, 1991. After hearing from Circinus, the RCC elected to rescind their recommendation and study our submitted written objections. Not only is it therefore possible that the PAC would have acted similarly, but it is extremely inconsistent to reconvene the RCC meeting because of improper notice but not reconvene the PAC meeting.

As stated in the enclosed letter, I am attempting to not only protect my client but to prevent the City from incurring further liability in this matter.

2025 RELEASE UNDER E.O. 14176

COMMENTS

Will Hyde
September 27, 1991
Page 2

Thank you for your attention.

Very truly yours,

HORLEY, SCHWARTZ, CARPFIELD & RICE



JOSEPH A. SOLONOH

JAB:SC
cc: Wayne Menck, President
Circinus Corporation
Michael Jacobs, Vice-President
Circinus Corporation
Philip Hinchav, President
A.D. Hinchav Associates
James J. Eischen, Jr., Esq.
(H Street Coalition)
Richard R. Freeland, Esq.
(First Interstate Bank)
Matthew Peterson, Esq.
(Alvin Malnik)
Ralph Kostant, Esq.
(Scripps Hospital)
Richard Rudolph, Esq.
(City of Chula Vista)
Tim Nader, Mayor
Donald Reed, C.E.O.
Chamber of Commerce
John Goss, City Manager
Chris Salomone, Director
Community Development Department
Maryann Miller, Environmental Review Coordinator
Planning Department
Barbara Gilman, Chairperson
Design Review Committee
Resource Conservation Committee
Andrew B. Campbell, Administrator of Planning,
Sweetwater Union High School District
Kate Shuron, Director of Planning
Chula Vista City School District
Dr. Llewellyn Lieber

RESPONSES

RESPONSES

COMMENTS

218. The letter of comment is noted. It does not reflect on the sufficiency or adequacy of the analyses included in the DEIR and no response is necessary.

WORLEY, SCHWARTZ, GARFIELD & RICE
ATTORNEYS AT LAW

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WILLIAM R. WORLEY
ROBERT A. SCHWARTZ, JR.
ROBERT A. GARFIELD
ROBERT C. RICE
JAMES A. WHELAN
PATRICIA M. WHELAN
JOSEPH A. SOLOMON

September 24, 1991

Ms. Barbara Gilman, Chairperson
Design Review Committee
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

Re: Scripps Hospital Expansion

Dear Ms. Gilman:

Enclosed is a copy of a letter mistakenly omitted from the packet I handed to you at the meeting of your committee on September 23, 1991.

I do understand that, from your perspective, the majority of our procedural and substantive challenges to this project are not your concern. However, at least one point, the fact that the Scripps Phase Ultimate is neither guaranteed nor even enforceable as a practical matter, is relevant for your consideration. Scripps is selling you on a project which, as presented, may never be built. In support of this, I submit the enclosed City staff memo.

Very truly yours,

WORLEY, SCHWARTZ, GARFIELD & RICE


JOSEPH A. SOLOMON

JAS:sc
Enc.
Cc: Wayne Wanoka
Michael Jacobs
Philip Hinchey
circled@att.com

1715 169 619 FAX TEL TEL NO: 619 583 0000 FAX TEL TEL NO: 619 583 0000 FAX TEL TEL NO: 619 583 0000

COMMENTS

RESPONSES

9/27/91 cc:
 James J. Eischen, Jr., Esq.
 (H Street Coalition)
 Richard R. Zealand, Esq.
 (First Interstate Bank)
 Matthew Paterson, Esq.
 (Alvin Malnik)
 Ralph Kostant, Esq.
 (Scripps Hospital)
 Richard Rudolph, Esq.
 (City of Chula Vista)
 Tim Hedar, Mayor
 Donald Reed, C.E.O.
 Chamber of Commerce
 John Goss, City Manager
 Chris Salmons, Director
 Community Development Department
 Maryann Miller, Environmental Review Coordinator
 Planning Department
 Will Hyde, Chairman
 Town Centre Project Area Committee
 Robert Fox, Chairman
 Resource Conservation Committee
 Andrew B. Campbell, Administrator of Planning,
 Sweetwater Union High School District
 Kate Shurson, Director of Planning
 Chula Vista City School District
 Dr. Dlevellyn Liaber

COMMENTS

RESPONSES

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DEARL S. WENCKE
 WILLIAM J. SCHWARTZ, JR.
 THOMAS A. GARFIELD
 JENNIFER TERESA WILSON
 JAMES R. WHEIL
 PATRICIA KEV
 JOSEPH A. BOLONON

September 24, 1991

Mr. Robert Fox, Chairman
 Resource Conservation Commission
 City of Chula Vista
 276 Fourth Avenue
 Chula Vista, CA 91910

Re: EIR 90-07 (Draft EIR--Scripps Hospital Expansion)

Dear Mr. Fox:

This firm represents Circinus Corporation, Wayne Wencke, President, one of the owners of the Master Ground lease covering the property upon which the above-referenced redevelopment project is planned.

For the request of your Commission at its meeting of September 23, 1991, enclosed are copies of previous comment letters submitted on behalf of Circinus Corporation. Also enclosed is a copy of a City staff memo which supports our assertion that the EIR contains no guarantees that the Scripps project will built to Phase Ultimate.

Also enclosed is correspondence from the City Attorney, which correspondence was mistakenly omitted from the packet of materials I submitted at the September 23, 1991 meeting of your Commission.

Your commitment to review these materials prior to making a recommendation regarding the EIR is extremely appreciated. As you know, it is our position that there have been some serious problems regarding this particular EIR process. However, while my role is focused on challenging the procedural problems, there are equal deficiencies in the substance of this EIR.

Further, it is difficult to separate process from substance. For example, the EIR contains inadequate response to the enclosed comment letters, violating CPOA procedural requirements, yet in addition the enclosed letters point out serious flaws in the EIR itself. These flaws include not only traffic, but a myriad of other problems including alternative sites, alternative uses, toxics, economics, consistency with state and local law, sewage, noise, and importantly, the overall need for an expanded hospital.

Thank you again for your consideration.

Very truly yours,

MORLEY, SCHWARTZ, GARFIELD & RICE



JOSEPH A. BOLONON

JAB:ec
 Enc.
 cc: Wayne Wencke
 Michael Jacobs
 Philip Hirsch
 sVw:tr

219. Please refer to responses to Comment #s 134 and 145 regarding responses to comments on the previously circulated DEIR. Please refer to response to Comment #215 for a discussion of the locations in the DEIR where the issues listed in this comment are addressed.

RESPONSES

COMMENTS

- 9/27/91 cci
- James J. Kischen, Jr., Esq.
(H Street Coalition)
- Richard F. Freeland, Esq.
(First Interstate Bank)
- Kathie Peterson, Esq.
(Alvin Mank)
- Ralph Kostant, Esq.
(Borlippo Hospital)
- Richard Rudolph, Esq.
(City of Chula Vista)
- Tim Hader, Mayor
Donald Road, C.E.O.
Chamber of Commerce
- John Goss, City Manager
- Chris Falcone, Director
Community Development Department
- Maryann Miller, Environmental Review coordinator,
Planning Department
- Will Hydo, Chairman
Town Centre Project Area Committee
- Darbara Gilman, Chairperson
Design Review Committee
- Andrew B. Campbell, Administrator of Planning,
Sweetwater Union High School District
- Kate Shuron, Director of Planning
Chula Vista City School District
- Dr. Llewellyn Lieber

9/27/91 cci

9/27/91

COMMENTS

RESPONSES

220.

Reclaimed water facilities are planned to be significantly expanded in San Diego County with implementation of the overall Clean Water Program for Greater San Diego. The nearest planned water reclamation facility to the Scripps Memorial Hospital project is the Otay Valley Water Reclamation facility proposed to be located along Otay Valley Road east of I-805. Conveyance pipelines proposed to be constructed in conjunction with the water reclamation plant would transmit treated water to a proposed South Bay treatment plant off Dairy Mart Road either via Otay Valley Road/Main Street/Beyer Boulevard or via I-805/SR-905. Reclaimed water for reuse for irrigation or other nonpotable uses would be pumped from the Otay Valley treatment facility to uses within the region (Otay Valley Water Reclamation Project EIR, City of San Diego, 1990, DEP No. 90-0225).

220

Typical markets for reclaimed water include parks, golf courses, cemeteries and large landscaped areas such as landscaping within Caltrans right-of-way. At the present time, specific markets for reclaimed water generated by the Otay Valley facility have not been identified although potential markets include proposed park and open space areas within Otay Ranch and other areas in the Eastern Territories and landscaped areas on Otay Mesa. Double-piping is required for distribution of reclaimed water since the RWQCB requires that distribution systems for potable water and reclaimed water be kept completely separate; double-piping is currently being provided for new developments within the Eastern Territories and in other areas of San Diego County. At the present time, a market for reclaimed water has not been identified in the central Chula Vista area within which the project site is located. This is due to the fact that large park or landscape areas suitable for reclaimed water use are not present in downtown Chula Vista and the area has not been piped for reclaimed water distribution. If these factors change, reclaimed water could be made available to the Scripps Hospital project.

CHULA VISTA PLANNING COMMISSION MEETING OF SEPTEMBER 25, 1991
VERBATIM TRANSCRIPT OF PUBLIC TESTIMONY AND CONGRESSOR COMMENTS

ITEM 2. PUBLIC HEARING: SCRIPPS MEMORIAL HOSPITAL EXPANSION -
RE-CIRCULATED DRAFT EIR (EIR-90-07)

Chair Fuller: Are there any questions of staff before we open the public hearing?

Commissioner Decker: Just one, Madam Chair. I am curious about the unmitigable problem with the water. My understanding is that there is a plan afoot, when and if we go into recirculation of water from the Ft. Loma plant, which is, I believe, level 2 filtering or something like that. Does this take that into account as well? Or would it be a problem later on if we do in fact do this? Then would it not be mitigable if it is not a problem?

June Collins: I'm June Collins with Dudek & Associates. Are you referring to use of reclaimed water for landscape irrigation and that type of thing?

Commissioner Decker: Yes.

June Collins: Just to clarify the impact analysis with respect to water use, it was identified as an incremental contribution to overall water use in the project area. You know, use of reclaimed water in the project area, did not identify a direct impact with the project associated with water use. I do conclude that the project incorporated appropriate drought tolerant landscaping and other types of water conservation measures to the extent possible. So I wanted to clarify that it was just an incremental contribution to cumulative impacts that was identified in the EIR, and that conclusion was based on the current drought conditions in the county and the fact that just about any project that increased intensity based on those existing circumstances, the fact that the county reports most of its water would result in an incremental contribution to overall cumulative water use in the county. So, you know, use of reclaimed water, which the city on this project itself, you know, would use reclaimed water. We could certainly provide a discussion in the response to comments of the status of the Otay Valley water reclamation project. You know, the potential for use of reclaimed water within the City and for landscaping in the project site. I can't say at this time whether or how that would change the conclusions that were drawn.

Commissioner Decker: My general thinking is that it probably is rather insignificant in the amount of reclaimed water it could use, but I was just wondering if you might have thought about it. Thank you.

COMMENTS

RESPONSES

221.

As stated on pages 116 and 117 of the DEIR, implementation of the proposed project would result in an average daily demand of water of 70,780 gallons which represents an approximately 10,280 gpd increase when compared with existing uses on the project site. Single family detached homes generally use 300-500 gallons of water per day. Assuming the 13-acre site were developed with single family homes on approximately 5,500 square foot lots (approximately 100 units at about 8 du's/acre), residential development on the project site would use water at a rate of approximately 30,000-50,000 gallons per day. Assuming single family homes were developed on only the 8.9-acre expansion area, again assuming 5,500 square foot lots (approximately 63 units), residential development on the project site would use water at a rate of approximately 18,900-31,500 gallons per day.

222.

Under the City's Growth Management Program, any development in the Eastern Territories over 50 units is required to have a water conservation plan approved by the City Council. The proposed project is not included in the Eastern Territories.

In addition, the City Council has directed staff to begin working on the adoption of a city wide water off-set policy which would affect projects city wide. This policy is currently being developed by City staff and it is not clear whether it would be implemented in time to affect the Scripps project. Mitigation measures have been included in the DEIR to minimize project specific water usage to a level of insignificance, however water usage would remain cumulatively significant due to the regional water shortage.

221

Commissioner Carson: Hadam Chairman, I have a couple of questions. Going along with the water issue, on the net water demand of 10,000 to an 80-gallon-per-day, how many homes would that approximately serve if you were doing it on a hose basis?

Jane Collins: That's a good question, and I'm afraid I don't have the answer to it, but I could certainly check into that.

Commissioner Carson: It would make a nice comparison for me, so I can see.

Jane Collins: Okay.

Commissioner Carson: The other thing is in the staff report at the bottom of page 9, and maybe this is to come later, but it's in the last paragraph and it says, "Additionally, although not listed as a mitigation measure in the DEIR, Scripps may be required to comply with the City-approved water..." And what I'm questioning is this "MAY" be required. My question is why aren't they going to be required? Is this due to the fact that we still don't have a water plan, and that's why you are saying "may be required"? I think we need to say very strong, clear, that any development that takes place in the City of Chula Vista will have to adhere to a reduction, and replacing of some type of thing, whether it's retrofitting, whether it's a new thing that would come up because pretty soon everything is going to be retrofitted, right? And we'll run out of places to retrofit? But there has to be another alternative. We can't let just one project--any project from now on--unless we get bundles and bundles of rain, which might happen, which is what all of those people are saying that could happen--if that happens, then we're not going to have a problem at the present time, then that's the idea that I think it needs to be made definite, then that's deciding that. That they have to participate, and they have to come along and follow City plans.

MaryAnn Miller: Commissioner Carson, in response to your question, the reason that the staff report says "may be required" is, my understanding is the City is currently in process of preparing water plans, and currently the areas that are designated for conference to those plans are in the Eastern Territory, so actually Scripps as it's developing now would not be necessarily required to comply.

Commissioner Carson: Alright, so then are you saying to me that since I live in the western part of Chula Vista that my water usage will never increase? I think, then, that if that's the case, then we, then I need to say to staff we need to consider all parts of the City of Chula Vista, not just the Eastern Territory. And those people who have been crunched come it's give and take. And those long time are the ones that are going to be taken away from their luxury of continuing to water. As we go through here, we see more brownings of the City of Chula Vista. And it's due to the fact that people are cutting back on the use of the water. And, sure, we live in a desert area, but at the same time, if we're going to be talking about the -- the show offs for everybody, is the way I look at it.

MaryAnn Miller: I think the best thing for us to do is refer your concern to the staff person who is working on this issue? And we can take it up with him.

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COMMENTS

RESPONSES

225. The comment is noted. Please see the Introduction to this FEIR as well as Item #1 of Attachment A to these responses to comments for a detailed response to this comment on the Socioeconomic Considerations Report.

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Commissioner Carson: Alright, on page 151, the last--it's the fourth line from the bottom. "According to the applicant, the existing hospital facility is currently overcrowded and patients are going outside Chula Vista to receive medical care." That statement still bothers me, because I'd still like to see those figures to back this up. How many people are seeking care out of the City of Chula Vista because they don't go to the doctor; they go to Chula Vista. They elect to go to La Jolla to the doctor; they elect to go to Mercy Hospital; they elect to choose Chula Vista if you put it in front of them, just want that. There is currently overcrowding at the hospital, but because of Chula Vista to parson. So, the maintenance going outside of Chula Vista to receive medical care, it needs to be qualified as to the--maybe for personal choice they're going outside the City of Chula Vista for personal care. That's the way I see it. And I was wondering why my Draft EIR had no appendices.

MaryAnn Miller: Commissioner Carson, it's been the policy of the City to provide appendices upon request. If you feel that perhaps we need to relook at that and send them out with each EIR, that's something we can take into consideration, too.

Commissioner Carson: I didn't realize that, after being on the Commissioner for almost 7 years.

MaryAnn Miller: My apologies. I think in the future, we'll just make sure that we send an appendix.

Commissioner Carson: It sure would make it easier, because I read along and it says to refer to Appendix F of the report, and it

tells me that all these things are going to happen for water, and I'm searching and I start digging all over my house thinking, did I get a packet? And where is it? And so it would be nice if I had it all together so I could see the big picture. And I would really appreciate it.

MaryAnn Miller: We'll make sure you get them in the future.

Commissioner Carson: I know it seems more paper. Thank you. Chair Fuller: Are there any other questions of staff? If not, I will open the public hearing on the recirculated draft. Requesting to speak in favor is Jeff Bille.

Jeff Bille: Thank you. Media Chair and Members of the Commission, my name is Jeff Bille and I'm the administrator of Scripps Memorial Hospital. And I appreciate the opportunity to be here. We have designed what we consider to be an outstanding project in our urban core and one that will bring additional new life to the City of Chula Vista, especially the downtown area of the City of Chula Vista. We believe we have a project that will greatly enhance the City itself in the delivery of high-quality medical care to the people of Chula Vista. We recognize the potential for the impacts identified in the EIR, especially in terms of traffic, visual impacts, noise, etc. We at Scripps are prepared to undertake all of the mitigation measures described in the EIR. With me this evening are Jim Leary, our project architect, and Ralph Kostant, our legal counsel, and we'd be happy during the course of this, if there are any questions, to try to answer them. Thank you.

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226. The comment is noted. It does not reflect on the sufficiency or adequacy of the DEIR and no response is necessary.

COMMENTS

Chair Fuller: The next speaker, in opposition, is Mr. Charles Harmon.

Charles Harmon: Hi. My name is Charles Harmon. I operate the Arby's Roast Beef Restaurant on the proposed site for the Scripps expansion, and I speak in opposition to the finalization of certification of this Draft EIR for many reasons. I might also add that I'm also part of one of the alternatives, the "H" street Coalition Alternative, to the Scripps expansion. That is basically where the bank, ReadCare medical facility, and Scripps Restaurant would stay on site in Phase I of the Scripps Hospital expansion and would not be removed from the site location to what we propose that, as a coalition of the companies on this property, we use the original position of--we've got issues on this property, I want to stay on-site and have no intention of leaving. We are the "blighting" influence as to speak that referred to in the EIR and take exception to that. We're not going to do this basically because it's really the Draft EIR and looking at the process, we believe it is flawed that it's really basically hopeless that this EIR could ever be an objective document with which to make a

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quality decision. In our opinion there are several of the items in there that are conclusion of staff that absolutely have no support data, that several of the conclusions are just incorrect, and some of them at least on the surface appear to be very prejudiced or biased. One of the items of concern is the fact that the Draft EIR with which you have reason problems. It's not going to bore you with going through all 22 of those, but I would like you to pay attention to those if you would and go back and read the EIR and see if you came to the same conclusion we have that there are some problems here. I'll just point out a couple of those, if I could. In the brief time that I've got. One is that it states that this expansion is consistent with the Redevelopment Plan. We take exception to that. The Plan states that it's a commercial/retail development. It was--the minutes from several meetings and we've included those in the documents that are Draft EIR comments that state that it was a commercial/retail redevelopment. We have been opposing that process for well over two years even though we've been coming to the meetings. This process started with Scripps and the City behind our back. This process states that there is notice of a financial subsidy--subsidy from the City. Now in fact you're being asked to have land and use the same area next to the High School that they've reduced the traffic on that alleyway between the Hospital and the Jr. High to 6 miles an hour in order to get the decibel level to where it needed to be for a school. The water use data is inadequate because it's data that was provided by Scripps Hospital. No analysis was done at all, and it's based on Scripps' existing usage. And if you look at the site, it's very intensive in relationship to the building and very little landscaping versus the proposed project with substantially more landscaping and water use than they currently have. So I think all the data seems absolutely nothing. The--it states in there that Scripps is making a big change in the process in May of 1989. It went into Redevelopment in a letter from Scripps' (Goshied). And in Desrochers who was, I believe, Community Development Director back in 1988 where they were already planning this expansion before any of the owners or the tenants on-site were even notified as to the expansion. In the regard to traffic, the worst intersection in the development as proposed is the intersection of Fourth and "H". I believe it goes down to a level 5. They talk about it being a cramped situation in which you get a cramped feeling going through that intersection, and there needs to be something done about it. That statement in there says the office building--it will cost \$12 million, so we should do something, but the project frontage building would reduce the Arby's alternative that as a viable alternative on the "H" street multi-lane, that part is okay to widen. No think it's biased and to hope that you will ready through that carefully and come hopefully to the same conclusion. Thank you.

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RESPONSES

227. Please refer to response to Comment #1.

228. Please refer to response to Comment #4.

229. Please refer to response to Comment #9.

230. Please refer to response to Comment #21.

231. Please refer to response to Comment #25.

232. Please refer to response to Comment #8.

233. Please refer to response to Comment #s 15 and 16.

RESPONSES

234. Complete responses to the MacLeod Consulting Services letter are presented in response to Comment #'s 8-29.

235. Please refer to response to Comment #125. The CEQA Guidelines (Section 15126(d)) state that an EIR must describe "a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project..." A reasonable range of alternatives has been addressed in the DEIR.

236. Please refer to response to Comment #'s 112 and 119. The City of Chula Vista has determined that the proposed project is consistent with the Town Centre II Redevelopment Plan.

COMMENTS

Chair Fuller: Thank you. The next speaker is Jim Eishen? Or Eisher, I couldn't tell.

Jim Eishen: It's Eishen. Madan Chatterjee and Members of the Commission. My name is Jim Eishen. Madan Chatterjee said, "We represent ATM and Mr. Harzon is the president of that company, who spoke to you, and, like Mr. Harzon, I just want to briefly comment you again to the fact that Mr. Harzon is not a resident of Chula Vista. In Chula Vista, we don't want to have a resident of Chula Vista who is not a resident of Chula Vista. It's an excellent letter in that it goes through a number of significant points. One might conclude from the staff presentation that the problems are limited to non-business, or non-land use or community character issues, and that's not entirely correct, at least from our point of view. So, I don't have the time to go through all of this, but I just wanted to bring that up. There's a lot of important red flags being provided to the Commission tonight, we hope, and there will be other speakers. And we are simply attempting to forward this process so it's done in a fair manner in compliance with CEQA. There's a number of significant problems that we have with the Draft EIR. A first off, in the documents given to you, there are 12 alternative sites, it says an alternative site was not conducted for the proposed project since the goals and objectives of the proposed project would not be achieved by relocating the project to an alternative site. I'm not sure if I could find a better way of indicating that this is a project proponent Draft EIR, as far as we can tell. Alternative site analysis is required under California law and under CEQA, and a project proponent can't simply say, well, making us look at alternative sites doesn't fit my goals and objectives. I just don't think that that's adequate, so we commend you to your attention and hope that you'll require the project proponent to look hard at alternatives intended to be a retail commercial location for the redevelopment plan. And that leads me to another point, there are some ignored significant impacts with regard to land use and community character. First off, the Redevelopment Plan says commercial retail--it's very clear. And in my letter to the Commission and also to the Agency, I cite the very specific documents not only identifying Area 4, which is the area across you see as slated for commercial retail redevelopment, but also the actual minutes of when Area 4 was incorporated into the Assisted Town Centre II Redevelopment Plan. This is significant; it does have to do with CEQA; it does have to be addressed in the Draft EIR. That was not intended to be an expansion site for the hospital; it was intended to be a commercial retail location by hospital and create a synergy with the Chula Vista Shopping Mall across the street. That was what the intent was, and nothing about the business--well, the business owners didn't tell them they were it, but that was what the property owners didn't tell them they were at that meeting. And comments for those minutes to take a look at those. I think they will reflect to you--I hope they will reflect to you the flavor that we take from it, and that is, it was intended to be business, and now all the businesses have to go and

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COMMENTS

RESPONSES

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we have a problem with that. And that leads me to another point, and that is the fact that all the businesses have to go is a CEQA impact. Social and economic loss may not be a CEQA impact; however, if social and economic loss causes a physical disruption of some kind, that is a CEQA impact under the CEQA guidelines. What we think is going to happen is that there was an intended commercial retail core that was supposed to be created to build businesses to help Chula Vista, to help the shopping center, the street, and add millions of dollars of retail activity. That's going to be replaced with an institutional use that was not intended by the very plan. That's a physical disruption of an intended planning situation, and we think that's a CEQA effect that needs to be mitigated. And we will note that we have this coalition proposal, which we think would be an outstanding mitigation. Project justification--this needs to be an objective document, and as Ms. Carson has indicated, there is a lack of data supporting some of the underlying assumptions supporting this project. And there just needs to be a lot more analysis. And there are these patients going to come from. Why are they going to choose this instead of Hecy, if they're in the area? Why are they going to choose this instead of the other? And we need to know that we do that, fantastic, but this would be a great time to have the project proponent document that, show the information, and I mean that's important. It's important to define the project to comply with CEQA. It's been stated that the economic analysis is not part of the document, but we have a lot of problems with the economic analysis provided, and so since time is running out I'll go on to

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No environmental impacts would be associated with the physical disruption or removal of the existing uses from the project site. The site has been previously disturbed by development and no resources are present on the site which would be disturbed by demolition of the existing structures. As discussed on pages 91-93 of the DEIR, demolition activities would require removal of underground storage tanks associated with the existing gas station on-site and concern has been expressed regarding the possible presence of asbestos in existing structures on the project site. Measures have been incorporated into the project, as described on page 93, to mitigate potential impacts associated with removal of hazardous materials from the site in conjunction with construction activities. Demolition activities would occur in conjunction with the overall construction activities for the proposed hospital expansion. Short-term traffic and air quality impacts associated with construction activities are discussed on pages 82-83 and 102 of the DEIR respectively.

As noted in response to Comment #111, it is not anticipated that elimination of the existing uses from the project site would adversely affect the overall community character of central Chula Vista nor lead to any physical changes. Similar uses are located within one mile of the project site. In addition, it is anticipated that the uses to be eliminated would generally be relocated within the central Chula Vista area. Please refer to response to Comment #37 for a discussion of the current status of relocation efforts. Please refer also to Item #7 of Attachment A of these responses to comments for a discussion of the degree to which the proposed project and the alternatives analyzed in the DEIR would be complementary to existing uses in central Chula Vista.

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The introduction to this FEIR as well as Item #1 of Attachment A to these responses to comments presents a detailed discussion of responses to comments on the economic analysis.

COMMENTS

two other things. Just briefly, the "H" street Coalition description is inadequate in the draft EIR. There is a whole new traffic analysis created that is not really what the project is. I mean, a left turn was created that was never in existence, and so we specifically ask that the Draft EIR be corrected to properly define the "H" Street Business Coalition project. And just a final note. This has to be objective. There have been a lot of people with this, and that's why you're going to have an opportunity to request staff to go back and take a hard look at whether land use and community character aspects should be better analyzed and mitigated. Thank you.

Chair Feller: Thank you. The last request to speak is from Wayne Hencke.

(The following was an organized presentation which was allowed 10 minutes.)

Wayne Hencke: My name is Wayne Hencke, the last name is spelled W-e-n-c-k-e. I'm president of Circinus Corporation--that's spelled C-i-r-c-i-n-u-s Corporation. I also represent the owners of the master ground lease for the entire site. In fact, many, many years ago my father drafted the documents that created the commercial that you see on the site currently. We have a number of concerns of the site, and I'm not going to be the only person speaking here. There are several other consultants that we've brought along, and I'm just going to very briefly outline those concerns. First of all, it's regarding the document, which you just took a picture of. It's a description of that from Mr. Kishen. There are a lot of unresolved issues, and all of them need to be addressed fully and factually, and rather than given lip service. We've made a lot of requests and most of them have received just simply lip service. It's also never really been proven, and again Mr. Kishen just made a reference to this, that the highest and best use for the site would be anything other than commercial. We believe that when an analysis is completed you would find that it truly is the highest and best use to leave it commercial as it does create a synergy for the commitment that was already made by the City to redevelop that regional mall. Additionally, the alternative sites issue--we believe that's flawed significantly and needs further study. Even before that, the financial consideration position you will touch about or on the existing site. You can't be done, but we've never seen any formal analysis of that, so we can all decide for ourselves. The water use issue, the hazardous waste on the site, the testing that's been completed again was done by Scripps Hospital. We believe it was wholly inadequate, and it doesn't reflect all the instances that are on the site. The financial considerations that were done on site also were done inappropriately, and the phasing of those financial considerations is out of sync and those numbers make a big difference. In fact, it ends up leaning towards our project if you look at those numbers at the end of the presentation. The traffic issue--we also have consultants speaking on that, and in fact, we have had two consultants look at that and those numbers, again, are also

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RESPONSES

239. Please refer to response to Comment #3 which presents an evaluation of the revised site plan prepared for the H Street Business Coalition Alternative. The only changes in the revised site plan discussed in response to Comment #3 are the elimination of a median along the main H Street access to the hospital and the provision of one-way access only to the hospital from H Street. It is unclear what left turn is being referenced in this comment. Additionally, as stated on page 134 of the DEIR, land use/visual quality impacts of the alternative are analyzed.

240. Please refer to pages 151 and 152 of the DEIR and response to Comment #125 for a discussion of alternative sites. Item #2 of Attachment A to these responses discusses estimated tax revenues. An alternative expansion configuration which would expand the hospital to the north and east is referenced on page 152 of the DEIR.

241. Responses to comments on the water analysis are presented in response to Comment #'s 25 and 220.

242. A limited hazardous waste potential assessment has been completed and is reproduced in full in Appendix D to the DEIR. The hazardous waste study was completed by Robert Prater Associates for Scripps Memorial Hospital. The study was not completed by the hospital.

243. Please refer to the Introduction to the FEIR as well as Item #3 of Attachment A to these responses to comments for a detailed presentation of responses to comments on the economic analysis.

244. Responses to the traffic consultants letters of comment (Entranco*Federhart and Monroy-Lopez) are presented in response to Comment #'s 83-94.

RESPONSES

245. The Retail and Entertainment Alternative referenced in this comment is analyzed in detail on pages 141-150 of the DEIR. The level of analysis provided in the DEIR is commensurate with the level of detail available to the EIR Preparers regarding features of this alternative. A quantified traffic analysis of the alternative is provided along with a discussion of the socioeconomic considerations associated with the Retail and Entertainment Alternative. Socioeconomic considerations associated with the Retail and Entertainment Alternative are discussed on pages 165-175 of the DEIR and in Appendix G to the DEIR.

246. The DEIR was prepared as a direct result of a proposed project by Scripps Memorial Hospital. It analyzes potential environmental impacts of the Scripps proposal only. A specific alternatives section is included in the DEIR to analyze potential alternatives to the proposed project. The Retail and Entertainment proposal is analyzed in this Section, as an alternative to the proposed project.

247. Please refer to response to Comment #38.

248. Please refer to response to Comment #s 42 and 43.

249. Please refer to response to Comment #47.

250. Please refer to response to Comment #51.

251. Please refer to response to Comment #62.

COMMENTS

severely flawed. And finally, the redevelopment process itself must be considered in a disclosure fashion if nothing else by the CEQA document, and that is factually flawed in that we are the owners in interest in that site. We were not properly informed previously as we've been. Phillips and should provide a project that we believe to be superior, and in addition, an analysis has never been done to prove otherwise. Also, of course, the law requires that we were included first. The reason it's particularly applicable to CEQA process is that by putting us down simply as an alternative, we do not get the full analysis benefit and support of the City, nor do we get the full benefit of a complete, fair, unbiased comparison because we are simply considered to be an analysis 7777777 otherwise. We request, in summary, if I may summarize in advance, that this EIR is completely reanalyzed, recirculated, and I think after all that analysis is done completely, that you will find that the Circinus proposal is the only proposal that makes sense for the site. Thank you.

My name is Phillip Kinabay, address is 6136 Mission George Road, San Diego, CA 92121. I have a letter to the City of Circinus dated September 14, 1989, with a few points in that letter. On the fourth page of the letter referring to the 3rd page of the EIR, it is pointed out, it was addressed in the general terms of community character. We believe that the EIR should to the extent possible address the relocation of each individual use that exists, and the one that I selected to point out was the Redicare, which is an emergency medical facility and if it was to be relocated, where was it going, how are the people who are now served by that use. On page 5 of my letter concerning page 43 of the EIR, the EIR states that the project would implicate one of the General Plan environmental goals, but that environmental goal, Job Creation, is not an environmental goal. The reader of the EIR does not know which General Plan environmental goal my letter refers to. The notice of Prep led item on page 6 of my letter referring to page 71 of the EIR, the traffic increases are going--there's going to be a relocation of the sound wall. The sound wall is going to be affected. The analysis of the sound wall relocation is not addressed. There is an increase in traffic. We don't know from reading the EIR whether or not the sound wall in its new location will be an effective noise barrier. On page 7 of my letter referring to sewer service, which is on pages 119, 121, and 123 of the EIR, it talks about the "c" and "w" street sewer lines being overloaded. And that the sewage from the new hospital would go to the "g" street line and some future study would be done about how that "g" street line is overloaded. I believe that the City stands to be doing with the sewer. I think that going to lead to some further growth-inducing effects in the area? That's now addressed in the growth impact section of the EIR, and we believe it's appropriate to do that. Skipping back to the last page of my letter, with reference to page 151 of the EIR, it states that the existing hospital facility is currently overcrowded. However, in the socioeconomic consideration which, again, is not part of CEQA, it says that a hospital has an occupancy rate of 83% in 1989. The socioeconomic report says that the City should undertake further studies on the need for hospital facilities at some future time. We think in a land use decision for this hospital, such studies ought to be done now before you make a decision about Scripps and your overall land use for hospital facilities. Thank you.

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252. Please refer to Item #s 2 and 3 of Attachment A to these responses to comments for a detailed presentation of responses to comments on the economic analysis.

COMMENTS

Madam Chairperson and Members of the Planning Commission, My name is Michael Jacobs. I'm Vice-President for Ciroinus Corporation, and I want to say a couple of words with regard to the economic study that was done. While we're all glad that it is not required by CQA as a part of the process, I feel it's a very important very important issue to be considered in the EIR. There are some issues in the economic study that I'd like to bring out. The main focus of the economic study has been to compare the revenues the City from the alternatives presented. I'd like to deal with the Ciroinus proposal and Scripps proposal to show you the scope of what I'm interested in. The model used to generate those estimates have to do with the phasing in of the project, when the property changes title triggers when you get your sales tax revenue, and the economic study concluded that the Scripps phase 11 instance and the commercial retail proposal generated all instances and purposes, that you will find in the economic study, but I think it's important for you to know that if you really look at those models carefully you will see that Scripps says that their plan will be complete at the end of 15 years, and they phase the revenues in in the model in the 10th year. Well, maybe it won't be leaving them the same, the commercial retail proposal comes out 21 to 49% higher in tax revenue in that period of time that's been analyzed. I think it's important for you to know that minor changes generate different conclusions. In addition, there were some assumptions that 30% to 40% may sales tax revenues, but 30%, which was the most conservative one, was used in the analysis to make the conclusion. This change the color of the economic analysis dramatically, and I think you should know that 777777 project is certainly based upon economic factors.

My name is Arnold Torpe. I'm the traffic engineer with Entranco Engineers, offices at 2305 Congress in San Diego. And we have been asked to look at those portions of the study that are applicable to traffic. I guess what I have to say is really quite straight forward. I did get a copy of the appendix, and that appendix contained the traffic study, and the first thing I did was opened it and compared the project description in the traffic study to the project description in the full EIR. And I found some differences. I documented those differences--a letter has been provided to staff--and if I look at each of those differences between the two descriptions, it would tend to, in my opinion, overstate the traffic that should have been analyzed in the EIR or have yet to be explained to my understanding. And I think that is significant for your thinking, because what that means is potentially additional traffic could be added to the project. It is detailed in the full EIR and that of course, rippled through the rest of the analyses. Thank you.

RESPONSES

256. The comments are noted. They do not refer to the sufficiency or adequacy of the DEIR and no response is necessary.

257. As stated in the Introduction to the FEIR, economic analyses must be included in an EIR when the analysis indicates that economic effects may have secondary impacts on the environment such as physical changes. It was determined in this case that the economic impacts would not lead to any environmental impacts, therefore the economic analysis is separate from the EIR. However, in order to provide the public complete information, responses to all of the comments raised on the economic analysis during public review of the recirculated DEIR have been provided. For convenience, responses to economic comments have been included as Attachment A to the response.

258. The comments are noted. Please refer to the Introduction to this FEIR as well as Attachment A to these responses to comments for a detailed presentation of responses to comments on the economic analysis.

COMMENTS

256 Commissioner Carson: Do we have the choice of not closing the public hearing if we want to hear more on some of these things? I am concerned about one thing which was brought up. There is a number of things that were brought up, and thanks to Nancy delivering it to my house this afternoon so I read it in between the time that I came to it and went to work tonight. And there is a number of things I know will be addressed in the EIR. But the one thing that was not that last mentioned is a real concern to me, and our Attorney said the information will be--if we're doing something that it is, you know, has there been a back door meeting? I mean, I need to know what's going on here. I'm hearing some rattling of cages, and if this is taking place, then we should have the public hearing remain open so we can get this aired out, as far as I'm concerned. If this has not happened, and we haven't had a back door meeting, then I'm in favor of going ahead and closing the public hearing period. Cause I don't think we should belabor something and, you know, beat a dead dog.

Chair Fuller: Would you like to respond to that?

Assistant Attorney Rudolf: Sure, Madam Chair. I think the dead dog is going to be beaten for quite a while in the future until this dog's matter is resolved. It's certainly not personally aware of any back door deals. The issue is inappropriate for consideration with regard to the EIR. There is information with regard to the general history of how the project began that is unnecessary, superfluous, courteous to be involved in the EIR. It is important to it, and I don't think that your information on that issue, hearing open to continue to have further information on that issue. The legal issues that counsel raises will be addressed with regard to the project itself, and the issues that may result in litigation-- hopefully not--it's those are allegations that are easily made and will have to be followed up on and anything can happen with regard to those.

Commissioner Carson: Thank you. I just wanted you to say that publicly.

257 Commissioner Becker: Madam Chair. One comment to the City Attorney. Is the economic study an appropriate section or subsection of a CEQA EIR?

258 Assistant Attorney Rudolf: Well, Madam Chair. I have to get a little help from the CEQA expert, but that portion of the document before you does seem to come out from the CEQA document as Commission's specifically in response to questions to supply the Commission with that information, and specifically designated as not part of the CEQA document, because ordinarily those issues are totally outside of the environmental analysis. But that is not to say that economic issues are totally outside the purview of CEQA review, but to the extent that they are--those issues are lawfully within your review--and the analysis that must be considered on the environmental side, those elements are in the CEQA document proper. Commissioner Becker: Then I would further request that, if in fact this is not necessarily a legitimate part of the EIR, that it be just made an addendum as opposed to a section.

COMMENTS

Commissioner Casillas: One last 7777 issue, you know, you may recall that I was the one that mentioned this at our last hearing regarding this and I'm totally confused now. You know, we have other folks talking and it's not part of the CRA process; we have other folks talking us that it is, but just from the standpoint of business consideration, and very particularly in view of the fact that the city would in all probability be obligating some public funds, public money, to this effort should it proceed, I think it's very important for us to know what the feasibility, what the economic likelihood is that the project that's proposing will succeed. Commissioner Carson mentioned--she said it's stated there, that we'll have 100 beds or 125, or whatever the figure is, and that this will deter people from going outside the community for health services. Well, maybe that's true and maybe it isn't. And in addition to that, then we have the prospect of other health care organizations coming into the community and talking about providing significant services, maybe even before this project gets underway, should it be approved, and so on. And I think that's an important element that really ought to be studied from details. I would feel a lot more comfortable if I had some data, the address, was interesting to know that reading the report, that you address it, and I, you know, you told me a lot about 777 dollar, what the sales are or Plaza Bonita, but you didn't tell me, you didn't tell me what kind of--whether or not the 777 facility in this project would support whatever number of the beds are going to be--whether they're going to be, they're now 100 & something, and we're going to get 91 or 100 more. And whatever fact, you know, that's going to fly. And I'm concerned, and you know, the Redevelopment Agency, the City Council, us--the taxpayers, would have to be putting out money and whether or not we get it in terms of taxes back and so on, it's not clear on. I'm not satisfied with what I've got here in the sense that we got some information, very data, and I want to call you that I didn't read it all, I don't think I did, and I would like to make sure time to read all of that. And I guess what I'm saying is that I recommend that we keep the hearing open until...

RESPONSES

- 259.** Please refer to Item #2 of Attachment A to these responses to comments for a discussion of this comment.
- 260.** Please refer to Item #1 of Attachment A to these responses to comments for a discussion of this comment.
- 261.** Please refer to Item #2 of Attachment A to these responses to comments for a discussion of this comment.

COMMENTS

Chair Fuller: I've already closed the public hearing. I think that if you're saying to us we have some concerns about the issues that we've raised, that's fine. I'm not going to give you an opportunity to raise anything further. I'm assuming that the Final EIR is going to answer all of the questions that we've raised tonight on economics--whether that's a part of the EIR or not. Everything that was raised tonight by verbal testimony in the public hearing, plus all of this written documentation has to be responded to in the Final EIR. So I think what we're going to have to do is read this and then continue to read the EIR, and then the discussion whether or not we feel that these have been answered.

Commissioner Casillas: And at that moment, then, we certify.

Chair Fuller: Right. Either we certify or we don't certify. Commissioner Becker: In closing, I would like to make sure that we get the attachments to the --appendix to this document.

Chair Fuller: Okay. That will close anything further.

Unidentified speaker: ... clarification. If I understand your last statement, you're anticipating that all of the comments that have been made, regarding the Final EIR, that we're going to have to be responding to in the Final EIR. I believe Mr. Miller said at the beginning that the economic items would not be responded to, unless I misunderstood.

MaryAnn Miller: Madam Chair, to provide some clarification, hopefully, on the economic issue--economics is not an environmental issue unless it can be proven that it will lead to a physical deterioration. That has not been determined for this project. The economic analysis that was provided was provided at the request of your Commission to talk about hospital demand and some of the tax revenue implications of the facility. The Final EIR will respond to all environmentally related questions, and we can provide further clarification on the economic issues and how it relates or does not relate to environmental issues at that time.

Commissioner Carson: And the demand. And the demand and how--that will be addressed, right?

Jane Collins: Perhaps to clarify a little bit further, and I think that we haven't reached a final conclusion as to the specific format of the responses, the comments with respect to economic issues pending further consultation since we just received the comments today, actually. But I think perhaps we can state that all of the issues raised by the comments will be responded to in some fashion. As to the format or location of those responses, we can't draw any conclusions at this time.

Chair Fuller: Is that satisfactory with the members of the Commission?

Commissioner Casillas: Well, what's the alternative?

Chair Fuller: The alternative is not to be satisfied with the information in the Final EIR and ...

Commissioner Casillas: What I'm hearing is you're gonna get it what you're gonna get. And it's okay, I guess.

Commissioner Carson: No one said you had to accept it.

Commissioner Casillas: I understand that. And so, yeah, I'll just wait until we get it and see what it looks like.

Chair Fuller: So that concludes Item 2 on the scripps, and we certainly thank all of you for waiting.

MaryAnn Miller: Madam Chair, can I make a request that we just provide clarification that the public review period is now closed on the EIR?

Chair Fuller: Yes. I thought that's what I said.

MaryAnn Miller: Thank you. I just wanted to clarify.

cc:wp:m

RESPONSES

262. The comments are noted. Please refer to Introduction to this FEIR as well as Attachment A to these responses to comments for a detailed presentation of responses to comments on the economic analysis.

263. Please refer to Item #1 of Attachment A to these responses to comments for a discussion of this comment.

ATTACHMENT A

AN ADDENDUM

TO THE

SOCIOECONOMIC CONSIDERATIONS REPORT

**Attachment A to Responses to Comments on
the Scripps Memorial Hospital Expansion EIR
Chula Vista, California**

**AN ADDENDUM TO
THE SOCIOECONOMIC CONSIDERATIONS REPORT**

P&D Technologies
October 15, 1991

This is an addendum to the Socioeconomic Considerations Report, which was attached to the Draft Environmental Impact Report (DEIR) for the Scripps Memorial Hospital Expansion Project (EIR 90-07, SCH #90010569), dated August 8, 1991. This addendum responds to those comments on the DEIR which refer to the Socioeconomic Considerations Report. Since the subject matters of many of the comments are closely related, the addendum is organized by topic and identified by Item Number. A specific Item thus responds to one or more comments, which are listed at the beginning of the Item.

Item 1. Demand for General Acute Care Hospitals and Beds

This item responds to Comment Nos. 29, 56, 62, 111, 127, 128, 130, 147, 176, 188, 225, 238, 260, 263.

As noted in the original report, in 1989, Scripps Memorial Hospital and Chula Vista Community Hospital had a total of 290 general acute care beds (see Table A.1). Using comparable County-wide data, there was a demand for approximately 516 general acute care beds. Therefore, to the extent that the residents of South Bay use medical services with a frequency similar to that

TABLE A.1
GENERAL ACUTE CARE BEDS IN SOUTH BAY

	Existing	Proposed/ Future	Total
Community Hospitals			
Scripps Memorial Hospital	159	99	258
Chula Vista Community Hospital	131	79	210
Total	290	178	468
Estimated Demand			
South Bay	516	72	588
HMO/Membership Hospital			
Kaiser Permanente - Phase 1	—	227	227
Kaiser Permanente - Phase 2	—	212	212
Total	—	439	439

Source: Scripps Memorial Hospital, Chula Vista Community Hospital, Eastlake Development Co.

of the population of the County as a whole, the supply of general acute care beds was insufficient to meet demand.

Occupancy rates for general acute care beds in 1989 were 83.2% for Scripps Memorial Hospital and 77.7% for Chula Vista Community Hospital. Nevertheless, administrators of both hospitals reported that patients were regularly turned away for lack of space. This occurred due to requirements of health care guidelines and the personal preference of patients, which make it impractical to fill all beds at all times.

Although the number of patients who are turned away for overcrowding is not known, some estimates can be made. According to State of California Office of Statewide Health Planning and Development (OSHPD), in 1989, the two hospitals reported a total use of 85,457 patient-days for their general acute care beds. Using County-wide averages, it is estimated that the South Bay population required 122,568 patient-days of general acute care, or 37,111 patient-days more than were able to be treated in the two hospitals. While some patients may seek treatment elsewhere because of ties to specific physicians or institutional constraints (such as terms of medical insurance), lack of facilities and lack of medical specialties which are housed in the facilities are primary causes for the large number of patient-days treated outside South Bay.

When the proposed expansions at both Scripps Memorial Hospital and Chula Vista Community Hospital are completed, the total number of general acute care beds in South Bay will be 468, still less than the estimated 1989 demand of 516 beds.

Kaiser Permanente has proposed to construct a hospital in eastern Chula Vista in two phases: 227 beds by 1997 and 212 additional beds within an undetermined time frame. However, Kaiser Permanente is a health maintenance organization (HMO), and usage of the facility will be restricted to members of the organization. Over the short run, membership hospitals do not compete directly with community hospitals such as Scripps, since a patient in a membership hospital would come from a different patient pool, located in a greater service area than that of a community hospital. Over the long run, however, HMO's such as Kaiser will attempt to

subscribe additional memberships, which if successful would reduce the patient pool for community hospitals. The long term effect of the new hospital proposed by Kaiser Permanente is not determined at this time.

In conclusion, there is sufficient demand between 1990 and 2000 for general acute care beds for community, as distinct from membership, use in the South Bay area to justify the construction of both the proposed expansion of Scripps Memorial Hospital and the current expansion of Chula Vista Community Hospital. The effect of construction of a new hospital by Kaiser Permanente on the occupancy rate of community hospitals would depend on the degree to which additional members are subscribed by the HMO.

Item 2. Estimated Tax Revenues

This item responds to Comment Nos. 30, 64, 99, 101, 134, 135, 197, 213, 240, 252, 259, 261.

The proposed expansion of Scripps Memorial Hospital would have a positive revenue effect for the City of Chula Vista amounting to between \$1.16 million and \$2.34 million in present value terms. Sources of revenue considered are property tax increment, sales tax, and utility and franchise taxes. The lower estimate is associated with Phase 1 expansion, and the upper estimate is dependent on the timing of Phase 2 (Ultimate) construction.

It is assumed for the upper estimate that Phase 2 would be completed in fiscal year (FY) 1999-2000. If this phase is not developed until FY 2003-04, the present value of revenues would decline by \$320,000 to \$2.02 million, or an average decline of \$80,000 per year of delay. It should be noted, however, that a given amount of revenues to the City may be assured through payments which would be made by Scripps in lieu of taxes, where payments are tied to specific dates, regardless of completion of Phase 2 expansion. As noted in the original report, such in-lieu payments could be incorporated in the owner participation agreement between the Agency and Scripps.

At this time, the proposer of the "Retail and Entertainment" alternative has not demonstrated the economic feasibility of the project through any market or financial analysis. Thus the revenue estimates for this alternative are based on assumptions which may not apply to this alternative as implemented. For example, one assumption used in the original report, which substantially favors this alternative, is that the developer would purchase the remaining interests in the 8.9-acre property at the same price as would be paid by the proposed project. In fact, since many of the existing uses would not be relocated off-site, the purchase price (hence also the tax increment revenue) is likely to be significantly less. Another assumption concerns the amount of new taxable sales generated by this alternative, in contrast to sales diverted from existing retail establishments in the City. The two assumptions used in the original report—30% or 60% of sales as new—are not "minimum" and "maximum" estimates and cannot be averaged. They simply illustrate the implications of alternative assumptions regarding this variable.

Depending on the assumptions, the "Retail and Entertainment" alternative may have a greater or lesser revenue effect on the City as the proposed project. Without additional data, however, this alternative cannot be regarded as equally viable as the proposed project. In order to consider the alternative as comparable to the hospital expansion project (in terms of potential revenues to the City), the City should be assured of sufficient tax revenues or in-lieu payments, incorporated in an owner participation agreement such as that recommended for Scripps. The in-lieu payments would cover any shortfall from specified levels of revenues from tax increment, new sales tax (as distinct from sales taxes diverted from other retail establishments in the City), and utility and franchise taxes.

Item 3. Timing of Tax Revenues

This item responds to Comment Nos. 64, 65, 99, 101, 134, 243, 252.

It is suggested by one of the letters of comment that the revenue projections (Tables 1, 2, 7, and 8 of the original report) be changed to reflect (1) tax revenues from Phase 2 of the proposed project later than the year assumed in the original report and (2) tax revenues from the "Retail and Entertainment" alternative earlier than the years assumed in the original report.

As noted in the report and in Item 2 above, tax revenues from Phase 2 of the proposed project are dependent on the timing of construction. It is for this reason that the original report contained an analysis of the case containing only Phase 1 improvements, where the ultimate phase improvements are delayed indefinitely. It is concluded from this analysis that there are significant tax revenues to the City of Chula Vista even if only Phase 1 improvements are constructed.

Furthermore, the report recommends that the City specify in the owner participation agreement that the hospital would make in-lieu payments until Phase 2 improvements are constructed. If full in-lieu payments are made by FY 1999-2000, as contemplated in one version of the draft agreement, then the tax increment revenue projections shown in the original report would remain the same.

The suggestion to bring "forward" by one year the revenues attributed to the "Retail and Entertainment" alternative would mean that the City would realize full tax revenues in the same year that a property is transacted or a building completed. This is impossible, unless the transaction or building completion is accomplished on July 1 of the fiscal year.

For purposes of the original report, full tax revenues from all transactions or building completions were attributed in the following fiscal year. While this approach excludes supplemental assessments for transactions or completions which take place during the fiscal year, the effect of the exclusion is uniform for all alternatives and does not materially change the results of the analysis. Accelerating tax revenues for one alternative, but not for others, would introduce a large bias into the analysis.

Item 4. Employment Effect

This item responds to Comment Nos. 10, 31, 148.

Increase in employment is considered a beneficial effect primarily because it diversifies and strengthens the economic base of the City. The additional employees would also make purchases near the place of work, which otherwise may be made outside of the City.

As noted in the original report, the proposed project would generate 481 new jobs, assuming that existing jobs are relocated in the City. The "Retail and Entertainment" alternative would generate 86 jobs, of which 33 jobs are continued from existing uses.

On average, jobs in the health care sector have significantly higher compensation levels than jobs in the retail trade sector. According to the U.S. Bureau of Labor Statistics, nationally, the average weekly earnings of non-supervisory personnel in the health services sector in May 1991 was \$355, compared to \$199 for non-supervisory personnel in the retail trade sector. Hospital workers, a subgroup of the health services sector, had average weekly earnings of \$427.

Multiplier, or indirect, effect would be substantially greater for the proposed project than for the "Retail and Entertainment" alternative, due to the higher compensation paid to workers in the health services sector than the retail trade sector. However, the magnitude of this effect was not computed.

Item 5. Growth Inducing Effect

This item responds to Comment Nos. 54.

Growth inducing effect of the proposed expansion could potentially occur in two areas: (1) related medical uses and (2) population.

Related medical uses are primarily medical offices established by physicians associated with the hospital. In the proposed project, 124,420 sq. ft. of medical office space would be constructed, resulting in a total of 245,420 sq. ft. of available space in the vicinity of the hospital. The resulting ratio of 951 sq. ft. per bed is lower than that projected for Scripps Memorial Hospital in a Jolla but higher than that in San Marcos. Based on comparable experience by Scripps, it is anticipated that there would be sufficient space to meet demand for medical office in project vicinity.

The estimated increase of 481 jobs could potentially result in additional workers relocating to South Bay. However, according to a travel time analysis conducted by the San Diego Association of Governments, almost all of Central and South Suburban Statistical Areas, with a 1991 population of 868,210 people, lie within a 20-minute commuting distance of downtown Chula Vista. Thus, it is more likely that the new jobs would be filled by people commuting to the hospital without relocating their residence. Without relocation, the proposed project is not expected to induce any significant increase in the population of Chula Vista.

Item 6. Complementary Land Use for Chula Vista Center

This item responds to Comment Nos. 6, 34, 41, 63, 64, 113, 139, 152, 179, 209, 213, 237.

Land uses near a regional shopping center, such as Chula Vista Center, would complement the primary center if the uses are not represented in the primary center and if they attract additional, potential customers to the general area. Common examples of complementary uses near regional shopping centers are commercial office, convenience goods retail (supermarkets, drug stores), and specialized retail, such as automotive and furniture sales. The hospital and particularly the medical office building are complementary uses, since they would attract additional users and potential patrons to the Chula Vista Center.

It cannot be stated as a matter of general principle that retail uses at the fringe of a regional shopping center will complement the latter. If the primary center, after a recent and extensive

renovation, is not experiencing a high volume of sales, then placing similar or competing uses on the periphery will aggravate, rather than assist, the performance of the primary center.

In the case of the "Retail and Entertainment" alternative, the planned uses are a theater, a restaurant, and food, service, and other retail, in addition to relocated uses which currently exist on site. It should be noted that the existing Chula Vista Center also contains a restaurant and food court. In addition, a key component in the center's expansion strategy is to include the relocated cinema.

It is likely that the "Retail and Entertainment" alternative will itself benefit from its proximity to a regional shopping center. However, unless the uses and stores in the alternative are different from those in the expanded Chula Vista Center, the success may be achieved at some expense to the center.

APPENDICES

ENVIRONMENTAL IMPACT REPORT

for

SCRIPPS HOSPITAL EXPANSION PROJECT

(EIR 90-07)

SCH# 90010569

Chula Vista, California

APPENDICES

- A. Notice of Preparation and Responses**
- B. Traffic Analysis**
- C. Noise Analysis**
- D. Hazardous Waste Assessment Study**
- E. Scripps Memorial Hospital Infectious Waste Control Program**
- F. Geotechnical Analysis**
- G. Economic Analysis**
- H. California Department of Water Resources
Water Conservation Recommendations**

August, 1991



APPENDIX A
NOTICE OF PREPARATION
AND RESPONSES



PLANNING DEPARTMENT

May 29, 1990

NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT

The City of Chula Vista will be the lead agency for the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA) for the following project:

PROJECT: Scripps Memorial Hospital Expansion. A conditional use permit, precise plan, rezone, tentative parcel map, owner participation agreement, and design review application for the expansion of the existing Scripps Hospital complex from 4.7 acres to 8.5 acres. The phase ultimate proposal includes the addition of 396,490 square feet of hospital space, 124,500 square feet of medical office space, and 292,200 square feet of parking area.

CASE NO.: EIR-90-07

An initial study prepared for this project identified the following potentially significant environmental impacts: land use/community character, traffic/circulation, air quality, noise, public health (hazardous waste disposal), and visual quality.

For more information, or to provide comments on the scope and content of the draft EIR, contact the following person at the address and phone number listed below: Maryann Miller, Environmental Review Coordinator.

Written comments on the scope and content of the draft EIR must be sent to the City of Chula Vista no later than 30 days after receipt of this notice.

Attachments: Project Description
Area Map (Exhibit A)
Vicinity Map (Exhibit B)
Phase Ultimate Site Plan Map (Exhibit C)
Existing Land Use Map (Exhibit D)
Initial Study Checklist

WPC 7664P

SCRIPPS MEMORIAL HOSPITAL - CHULA VISTA

PROJECT LOCATION

The proposed project is located at the northeast corner of Fifth Avenue and H Street (435 H Street) in the City of Chula Vista (see Exhibit A). The project site includes the existing Scripps Memorial Hospital and approximately nine existing commercial uses (see Exhibit B). The corresponding Assessor Parcel Numbers are: 568-370-30 to 34; and 568-370-40, 42, 46 to 48.

PROJECT DESCRIPTION

The proposed project consists of the expansion of the existing Scripps Memorial Hospital, the addition of new medical office facilities and a 775-car parking structure to be accomplished in three phases (see Table 1).

The existing hospital, located on approximately 4.7 acres, consists of one to four story buildings with approximately 74,000 sq. ft. and 159 beds.

With the addition of approximately 3.8 acres of site area to the west, Phase I consists of adding 120,560 square feet to the hospital for a total of 258 beds, an additional 60,000 square feet of medical office facilities and 127,770 square feet of surface parking.

Phase Ultimate adds 275,930 square feet to the hospital for a total of 396,490 square feet, an additional 64,500 square feet of medical office facilities for a total of 124,500 square feet and a 775-car parking structure for a total of 292,200 square feet of parking area (Exhibit C).

The proposed project would include the displacement and relocation of nine existing commercial uses at the northeast corner of Fifth Avenue and H Street (see Exhibit D).

ENVIRONMENTAL ISSUES

As identified in the Initial Study conducted for the proposed project, potentially significant, adverse impacts have been identified. The following environmental issues will be addressed in the EIR: land use, visual quality, traffic/circulation, parking, noise, public health (hazardous waste disposal), and air quality (CO hotspot).

Land Use/Community Character

This section of the EIR will document existing land uses on the project site and in the project area and will describe potential changes associated with project implementation. Working with the redevelopment agency, potential changes to the existing character of the area associated with displacement of existing uses on the project site will be analyzed. Existing use of these facilities will be described along with the degree to which similar uses are located elsewhere in the project vicinity and could serve the community. The land use section will also describe existing land use designations (general plan, community plan, zoning, and redevelopment agency designations) on the project site and any changes which would be necessary to implement the project. The Land Use section will describe the conformance of the project to the environmental goals of relevant City plans and policies.

Visual Quality

Using photographs, this section of the EIR will document the existing visual environment of the project site and the surrounding area. Using plans prepared by the applicant, the EIR will document the changes in the visual environment which would occur with implementation of the proposed project. The relationship of the project to design guidelines for the project area included in relevant City plans and programs will be documented in the EIR. The visual analysis in the EIR will focus on potential view blockage associated with the project, maintenance of visual corridors, proposed landscaping and contribution of the project to the pedestrian street scene.

Traffic and Parking

The following scope of work has been developed for the traffic analysis. The level of detail for the alternatives analysis will be determined in consultation with City staff.

- Meet the City staff members of the project team to discuss limits of the study area, planned developments within the study area, and assumptions contained in the City's Final General Plan (Scenario #4).
- Generate and distribute traffic from the project site. Since the project proposes to replace existing land uses, the analysis will remove their existing traffic from the surrounding street system and add the proposed hospital expansion traffic. Develop trip generation rates accepted by the City of Chula Vista for the type of land uses proposed and distribute and assign this traffic to the street system in accordance with short term and long range travel patterns.
- Evaluate critical street segment and intersection capacities in the vicinity of the project. Particularly address the short term and long range traffic volumes and capacity along H Street, F Street, G Street, Broadway, Fifth Avenue, Fourth Avenue and Third Avenue. Intersection capacities of H Street/Interstate 5 ramps, H Street/Fourth Avenue, H

Street/Third Avenue, H Street/Interstate 805 ramps, F Street/Broadway, F Street/Fifth Avenue, G Street/Fifth Avenue and G Street/Fourth Avenue will also be addressed. The capacity analysis will be completed for existing conditions existing plus project conditions, and short term cumulative conditions. Long range (buildout of the General Plan Scenario #4) traffic conditions on the street system surrounding the project will also be analyzed.

- Evaluate the need for modification to existing traffic control devices or the need for new traffic control in the project vicinity. Specifically, pertinent safety and accident related data on existing roadway segments in the project vicinity will be analyzed.
- Evaluate the proposed site plan for potential circulation and parking constraints. This will include an evaluation of the proposed number of parking spaces, internal circulation and the location of driveway access to the site.
- Based on the above analysis, potentially significant adverse traffic impacts will be identified along with measures to mitigate impacts. The analysis will be documented in a report suitable for inclusion as an appendix in the EIR. The report will summarize the methodology used and the conclusions reached in the analysis.

Noise

The noise analysis will identify potential noise sources associated with the project including emergency vehicle noise. The results of the traffic study will also be used to document increased traffic noise in the project area as a result of the proposed expansion. Sensitive receptors will be identified and a complete noise analysis will be conducted including identification of impacts and recommendation of mitigation measures. If barriers are required, a barrier analysis will be completed and barrier heights and configurations will be recommended.

Health

Two health issues will be addressed in the EIR - potential impacts associated with removal of the existing gas station and potential health impacts associated with disposal of infectious waste by the hospital. It is anticipated that approved plans will be or have been developed both for the removal of the existing gas station and the disposal of infectious waste. These approved plans will be reviewed and documented in the EIR.

Other Issues

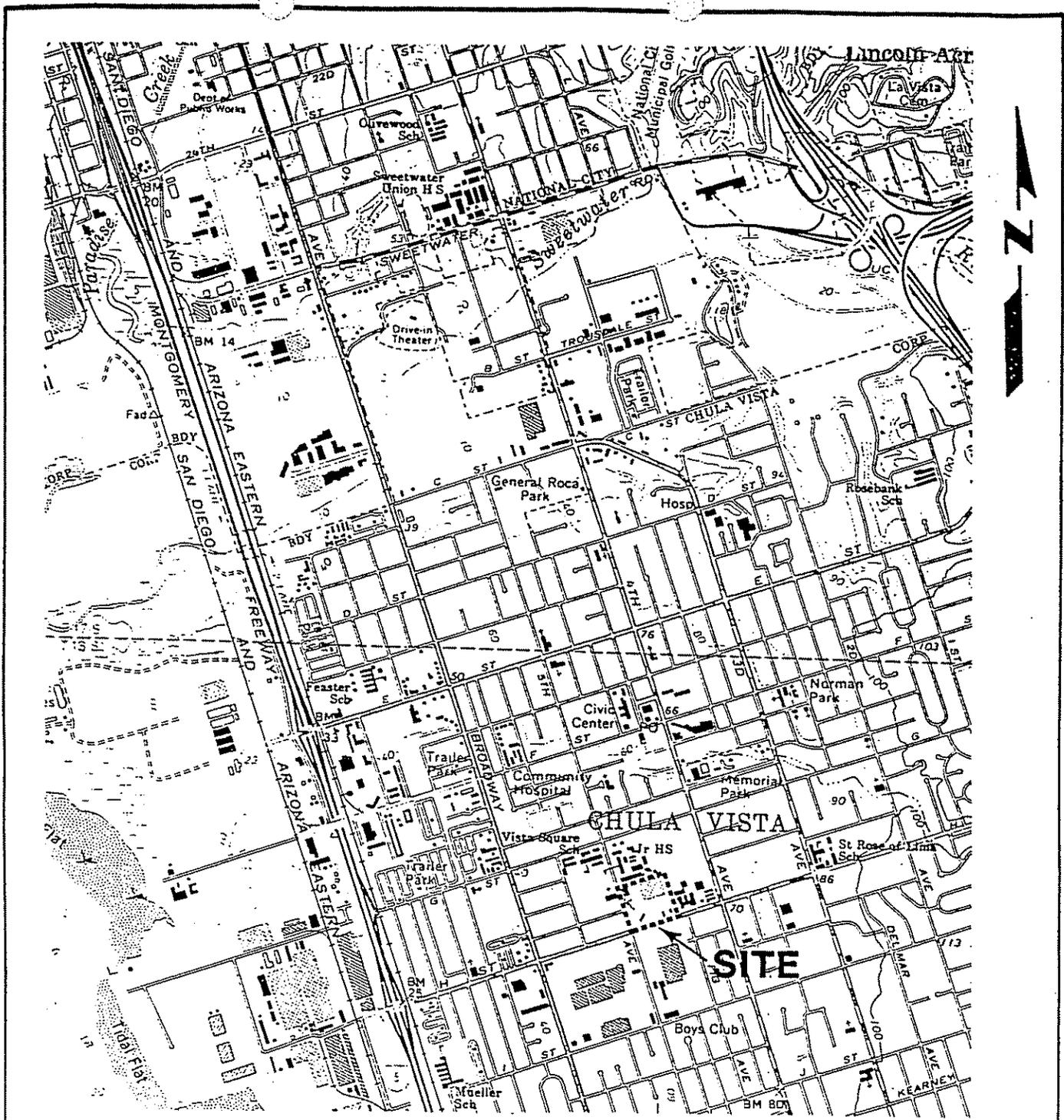
Two other issues may need to be addressed in the EIR. These include air quality and utilities. Air quality will be addressed if adverse congestion impacts are identified in the traffic study. If intersections or road segments would operate at below a level of service C in conjunction with

project implementation, the effect of this congestion on air quality in the project area will be documented in the EIR. Relocation of some utilities may also be required to implement the project. Such relocation, both onsite and offsite, will be described in the EIR and potential impacts evaluated.

As described above under Project Initiation and Scoping, the alternatives analysis will form a significant component of the EIR.

The EIR will also include a mitigation monitoring and reporting program in compliance with AB 3180. It is recommended that the monitoring program be prepared in tabular format as a separate section for ease of use during future monitoring and reporting efforts. A draft format will be prepared for review and approval by the City of Chula Vista staff.

WPC 7664P



Approximate Scale (feet)



Base: A U.S.G.S. topographic map titled "National City, California," dated 1967, photorevised 1975.

VICINITY MAP		
SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
PROJECT NO.	DATE	Exhibit B
349-18A	January 1990	

Table 1

RESUME: PHASE: SYMBOL	ULTIMATE BUILDING	NO. BEDS	BUILDING AREA	MAX HEIGHT	MAX NO. STORIES	PARKING REQ.	BASIS	PARKING PROVIDED	CONSTRUCTION TYPE	UBC OCCUP LOAD
1.A	EXISTING HOSPITAL	108	73,994 S.F.	58'7"	4+ basement	162 spaces	1.5/bed		TYPE I FIRE RESISTIVE	925
2.A	HOSPITAL EXPANSION PHASE I	150	120,560 S.F.	60'0"+mech penthouse light monitor	3+ basement	255 spaces	1.5/bed		TYPE I FIRE RESISTIVE	1507
2.B	MEDICAL OFFICE BLDG. PHASE I		60,000 S.F.	68'0"+mech	5	300 spaces	1/200 S.F.		TYPE I OR II	600
3.A	HOSPITAL EXPANSION PHASE ULTIMATE		132,570 S.F.	penthouse 60'0"+mech penthouse	3+ basement				TYPE I FIRE RESISTIVE	1657
3.B	HOSPITAL EXPANSION PHASE ULTIMATE		84,560 S.F.	48'0"+mech penthouse	2+ basement				TYPE I FIRE RESISTIVE	1000
3.C	HOSPITAL EXPANSION PHASE ULTIMATE		58,800 S.F.	44'0"+mech penthouse	3				TYPE I FIRE RESISTIVE	735
3.D	MEDICAL OFFICE BLDG.		64,500 S.F.	68'0"+mech penthouse	5	323 spaces	1/200 S.F.		TYPE I OR TYPE II	645
3.E	PARKING STRUCTURE		263,380 S.F.	40'0"	4+ 1 level below grade			775 spaces		
	SURFACE PARKING ON-SITE							80 spaces		
	EMPLOYEE PARKING OFF-SITE							155 spaces		
TOTAL		258	858,364 S.F.			1010 spaces		1010 spaces		

HEIGHTS ARE MEASURED FROM LOWEST
ADJACENT GRADE TO PARAPET

EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS

CASE NO. 20-35

I. Analysis (Provide in Section J an explanation of mitigation proposed for all significant or potentially significant impacts.)

YES POTENTIAL NO

- * 1. Geology
 - a. Is the project site subject to any substantial hazards, such as earthquakes, landsliding, or liquefaction? YES NO
 - b. Could the project result in:
 - Significant unstable earth conditions or changes in geological substructure? YES NO
 - A significant modification of any unique geological features? YES NO
 - Exposure of people or property to significant geologic hazards? YES NO
- * 2. Soils
 - a. Does the project site contain any soils which are expansive, alluvial or highly erodible? YES NO
 - b. Could the project result in:
 - A significant increase in wind or water erosion of soils, either on or off-site? YES NO
 - A significant amount of siltation? YES NO
- * 3. Ground Water
 - a. Is the project site over or near any accessible ground water resources? YES NO

Geology/soils impacts analyzed in soils report

YES POTENTIAL NO

- b. Could the project result in:
 - A significant change in quantity or quality of ground water? YES NO
 - A significant alteration of direction or rate of flow of ground water? YES NO
 - Any other significant affect on ground water? YES NO
- 4. Drainage
 - a. Is the project site subject to inundation? YES NO
 - b. Could the project result in:
 - A significant change in absorption rates, drainage patterns or the rate of amount of surface runoff? YES NO
 - Any increase in runoff beyond the capacity of any natural water-way or man-made facility either on-site or downstream? YES NO
 - Alterations to the course or flow of flood waters? YES NO
 - Change in amount of surface water in any water body? YES NO
 - Exposure of people or property to water related hazards such as, flooding or tidal waves? YES NO
- 5. Resources
 - Could the project result in:
 - Limiting access to any significant mineral resources which can be economically extracted? YES NO
 - The significant reduction of currently or potentially productive agricultural lands? YES NO
- 6. Land Form
 - Could the project result in a substantial change in topography or ground surface relief features? YES NO

7. Air Quality

YES POTENTIAL NO

- a. Is the project subject to an air quality impact from a nearby stationary or mobile source? YES POTENTIAL NO
- b. Could the project result in:
 - A significant emission of odors, fumes, or smoke? YES POTENTIAL NO
 - Emissions which could degrade the ambient air quality? YES POTENTIAL NO
 - Exacerbation or a violation of any National or State ambient air quality standard? YES POTENTIAL NO
 - Interference with the maintenance of standard air quality? YES POTENTIAL NO
 - The substantial alteration of air movement, moisture or temperature, or any significant change in climate either locally or regionally? YES POTENTIAL NO
 - A violation of the revised regional air quality strategies (RAQS)? YES POTENTIAL NO

8. Water Quality

- Could the project result in a detrimental effect on bay water quality, lake water quality or public water supplies? YES POTENTIAL NO

9. Noise

- a. Is the project site subject to any unacceptable noise impacts from nearby mobile or stationary sources? YES POTENTIAL NO
- b. Could the project directly or indirectly result in a significant increase in ambient noise levels? YES POTENTIAL NO

Emergency vehicles/inc'd ADT

10. Biology

- a. Could the project directly or indirectly affect a rare, endangered or endemic species of animal, plant or other wildlife; the habitat of such species; or cause interference with the movement of any resident or migratory wildlife? *Site is disturbed* YES POTENTIAL NO
- b. Will the project introduce domestic or other animals into an area which could affect a rare, endangered or endemic species? YES POTENTIAL NO

11. Cultural Resources

- a. Will the proposal result in the alteration of or the destruction of a prehistoric, historic, archaeological or paleontological resource? YES POTENTIAL NO
- b. Will the proposal result in adverse physical or aesthetic effects to a prehistoric or historical building, structure, or object? YES POTENTIAL NO
- c. Does the proposal have the potential to cause a physical change which would affect unique ethnic or cultural values? YES POTENTIAL NO
- d. Will the proposal restrict existing religious or sacred uses within the potential impact area? YES POTENTIAL NO

12. Land Use

- a. Is the project clearly inconsistent with the following elements of the General Plan?

Land Use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Circulation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Scenic Highways	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Housing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Noise	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Park and Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open Space	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Seismic Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	YES	POTENTIAL	NO
13. <u>Aesthetics</u>			
b. Is the project inconsistent with the Comprehensive Regional Plan?			✓
a. Could the project result in:			
Degradation of community aesthetics by imposing structures, colors, forms or lights widely at variance with prevailing community standards			✓
Obstruction of any scenic view or vista open to the public?			✓
Will the proposal result in a new light source or glare?		✓	
14. <u>Social</u>			
a. Could the project result in:			
The displacement of residents or people employed at the site? <i>(Existing employees will be displaced)</i>	✓		
A significant change in density or growth rate in the area?			✓
The substantial demand for additional housing or affect existing housing? <i>(Existing residential uses will be displaced)</i>	✓		
15. <u>Community Infrastructure</u>			
a. Could the project inhibit the ability of the urban support system to provide adequate support for the community or this project?			✓
b. Could the project result in a deterioration of any of the following services?			
Fire Protection		✓	
Police Protection		✓	
Schools		✓	
Parks or Recreational Facilities		✓	
Maintenance of Public Facilities Including Roads		✓	
16. <u>Energy</u>			
Could the project result in:			
Wasteful, inefficient or unnecessary consumption of energy?			✓
A significant increase in demand on existing sources of energy?			✓
A failure to conserve energy, water or other resources?			✓
17. <u>Utilities</u>			
Could the project result in a need for new systems or alternatives to the following utilities:			
Power or natural gas			✓
Communications systems			✓
Water		✓	
Sewer or septic tanks			✓
Solid waste & disposal			✓
18. <u>Human Health</u>			
Could the project result in the creation of any health hazard or potential health hazard? <i>Potential health hazard impacts from gas from or toxic Transportation/Access which will be displaced.</i>		✓	
19. <u>Transportation/Access</u>			
Could the project result in:			
A significant change in existing traffic patterns?			✓
An increase in traffic that could substantially lower the service level of any street or highway below an acceptable level? <i>* Traffic study required</i>			✓
20. <u>Natural Resources</u>			
Could the project result in a substantial depletion of non-renewable natural resources?			✓

YES POTENTIAL NC PROJECT REVISIONS OR MITIGATION MEASURES

The following project revisions or mitigation measures have been incorporated into the project and will be implemented during the design, construction or operation of the project:

J.

21. Risk of Upset

Will proposals involve:

a. A risk of an explosion or the release of any hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation) in the event of an accident or upset condition?

b. Possible interference with an emergency plan or an emergency evacuation plan?

* Hazardous wastes on site from gas str / medical wastes created w/ expansion of existing use.

Could the service requirements of the project result in secondary projects that would have a growth inducing influence and could have a cumulative effect of a significant level?

23. Mandatory Findings of Significance

a. Does the project have a potential to degrade the quality of the environment, or curtail the diversity of the environment?

b. Does the project have the potential to achieve short-term to the disadvantage of long-term environmental goals? (A short term impact on the environment is one which occurs in the relatively brief, definitive period of time, while long-term impacts will endure well into the future.)

c. Does the project have impacts which are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past project, the effects of other current projects and the effects of probable future projects.)

d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Project Proponent _____

Date _____

K. DETERMINATION

On the basis of this initial study:

____ It is recommended that the decision making authority find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION is hereby forwarded to the decision making authority for consideration and adoption.

____ It is recommended that the decision making authority find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the MITIGATION MEASURES described above have been ADDED to the project and a MITIGATED NEGATIVE DECLARATION is hereby forwarded to the decision making authority for consideration and adoption.

✓ ____ It is found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required to evaluate the issues identified in this Initial Study.

____ It is found that further information will be necessary to determine any environmental significance resulting from the project and the technical information listed below is required prior to any determination.

Maryann C. Miller
Environmental Review Coordinator

2-7-90

Date

WPC 0169P

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P.O. BOX 85406, SAN DIEGO 92138-5406



JUL 9 1990

July 5, 1990

11-SD-005
7.9

Maryann Miller
City of Chula Vista
Planning Department
276 Fourth Avenue
Chula Vista, CA 92010

Dear Ms. Miller:

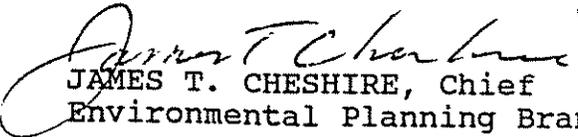
Notice of Preparation of a DEIR for the
Scripps Memorial Hospital Expansion, SCH 90010569

Caltrans District 11 will probably not have a responsible agency role in the preparation of this EIR. We are, however, interested in the traffic impacts that might be expected at Interstate Routes 5 and 805. Our contact person for traffic information is Richard Coward, Project Manager, Project Services Branch, (619) 237-7377.

Sincerely,

JESUS M. GARCIA
District Director

By


JAMES T. CHESHIRE, Chief
Environmental Planning Branch

MO:wkb

FRANK L. ASARO
ROSCOE D. KEAGY
RICHARD R. FREELAND
STEVEN A. MCKINLEY
ARNOLD NEVES, JR.
STEVEN M. SHEWRY
WILLIAM J. HEALY
GARY L. SIROTA

ASARO & KEAGY
ATTORNEYS AT LAW
FOURTH FLOOR
3170 FOURTH AVENUE
SAN DIEGO, CALIFORNIA 92103
TELEPHONE (619) 297-3170
TELECOPIER (619) 299-4268

June 28, 1990

JUL 2 1990
IN REPLY
REFER TO: _____

City of Chula Vista
Planning Department
276 Fourth Avenue
Chula Vista, CA 92010

Attention Ms. Maryann Miller
Environmental Review Coordinator

Re: Scripps Memorial Hospital Expansion
Environmental Impact Report

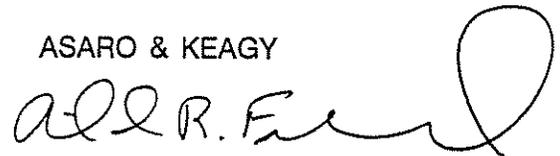
Dear Ms. Miller:

This office represents First Interstate Bank, whose Chula Vista Branch is affected by the proposed Scripps Memorial Hospital expansion. The purpose of this letter is to request that this office be placed on the mailing list to receive copies of all notices, correspondence, or other documentation relating to the Environmental Impact Report regarding the Scripps Memorial Hospital expansion project.

In the event that this request cannot be honored, please advise.

Very truly yours,

ASARO & KEAGY



Richard R. Freeland

RRF/mad
xc Ms. Kim Weber
Mr. Robert I. Behar

LILLICK & MCHOSE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
101 WEST BROADWAY, 18TH FLOOR
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 234-5000

IRA S. LILLICK (1875-1987)
CABLES "LILLICKMCHOSE"
INTERNATIONAL TELEX-559755
TELECOPIER (619) 236-1995

725 SOUTH FIGUEROA STREET
LOS ANGELES, CALIF. 90017
TELEPHONE (213) 488-7100

DIRECT (619) 544-3184

June 28, 1990

Ms. Maryann Miller
Environmental Review Coordinator
City of Chula Vista
276 Fourth Avenue
Chula Vista, California 92010

Re: RTM, Inc.
Environmental Impact Report (EIR)
Case No. EIR-90-07
Our File No. RTM01-001

Dear Ms. Miller:

We represent RTM, Inc. ("RTM"), the owner of the Arby's Restaurant to be displaced by the subject redevelopment project. On June 5, 1990, our offices received the Notice of Preparation of an Environmental Impact Report ("EIR Notice") for the proposed redevelopment project.

This letter is intended to comment upon the EIR process, and the scope and content of the upcoming EIR.

1. EIR Process.

The California Environmental Quality Act ("CEQA") requires an agency to prepare an EIR or negative declaration "as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." CEQA Guidelines Section 15004(b).

Delay in initiating the EIR Notice may effectively eliminate the opportunity for considering feasible alternatives to the proposed redevelopment project design.

Ms. Maryann Miller
June 28, 1990
Page 4

the alternative of no project. County of Inyo v. City of Los Angeles, 71 Cal.App.3d 195, 139 Cal.Rptr. 396 (1977); Citizens of Goleta Valley v. Board of Supervisors, 197 Cal.App.3d 1167, 243 Cal.Rptr. 339 (1988); Citizens for Quality Growth v. City of Mt. Shasta, 198 Cal.App.3d 418, 244 Cal.Rptr. 5 (1988); No Slow Transit, Inc. v. City of Long Beach, 197 Cal.App.3d 241, 242 Cal.Rptr. 760 (1987).

We request consideration of an alternative that includes all of the purported advantages of the proposed redevelopment project (improved health care, increased jobs, more efficient and productive use of the site, etc.) and also mitigates the significant impacts associated with business displacement, job loss and inconsistency with the Town Centre II Redevelopment Plan.

We specifically request the evaluation of an alternative project that substantially accomplishes the proposed hospital expansion but also retains RTM's Arby's Restaurant on the site. The Arby's Restaurant would be located either at its present location or on an appropriate frontage location.

Preliminary hospital expansion plans reflect that only 4.94 acres of the total 13.5 acre site will actually be used for hospital buildings. A viable project can be designed with sufficient room for the Arby's Restaurant to remain on the site with the proposed hospital expansion.

Scripps Memorial Hospital has stated that the Arby's Restaurant is simply incompatible with the hospital expansion. The compatibility issue must be addressed. It will be insufficient to report that Arby's Restaurant is not compatible with the building layout proposed by Scripps Memorial Hospital in light of the available acreage on the site.

We also request that an alternative 1 proposed redevelopment project be evaluate accommodate the desired increases in health car and retain the project's fundamental goals. Suc need not be limited to alternative locations cur the EIR applicant. Citizens of Goleta Valle Supervisors, 197 Cal.App.3d 1167, 243 Cal.Rpt: Goleta Valley v. Board of Supervisors, 214 Cal. Cal.Rptr. 521 (1989), reh'g granted 216 Cal.App.3d 48, 264 Cal.Rptr. 587 (1989).

*→ Alternative -
leaving Arby's
→ need greencheck
by ASAP (per FK)*

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June 28, 1990

Ms. Maryann Miller
Environmental Review Coordinator
City of Chula Vista
276 Fourth Avenue
Chula Vista, California 92010

Re: RTM, Inc.
Environmental Impact Report (EIR)
Case No. EIR-90-07
Our File No. RTM01-001

Dear Ms. Miller:

We represent RTM, Inc. ("RTM"), the owner of the Arby's Restaurant to be displaced by the subject redevelopment project. On June 5, 1990, our offices received the Notice of Preparation of an Environmental Impact Report ("EIR Notice") for the proposed redevelopment project.

This letter is intended to comment upon the EIR process, and the scope and content of the upcoming EIR.

1. EIR Process.

The California Environmental Quality Act ("CEQA") requires an agency to prepare an EIR or negative declaration "as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." CEQA Guidelines Section 15004(b).

Delay in initiating the EIR Notice may effectively eliminate the opportunity for considering feasible alternatives to the proposed redevelopment project design.

The Chula Vista staff first reviewed a Scripps Memorial Hospital preliminary expansion site plan in July 1988. Consideration of specific redevelopment projects began in early 1989. An exclusive negotiating agreement between Scripps Memorial Hospital and the Chula Vista Redevelopment Agency was entered into in October 1989. The Evaluation of Potential Environmental Impacts ("initial study") was prepared on February 7, 1990. The EIR Notice was not distributed until May 29, 1990. This is nearly four months after the initial study, seven months after the Exclusive Negotiating Agreement, and one and one-half years after the Scripps Memorial Hospital site plan was reviewed by the Chula Vista staff.

The inexplicable delay in initiating the EIR Notice precluded public involvement in the EIR process while the Scripps Memorial Hospital expansion plans were being finalized. The EIR Notice is the first opportunity for public involvement in the EIR process. The EIR process should be considered at a point in the planning process "where genuine flexibility remains." Mt. Sutro Defense Comm. v. Regents of the Univ. of Cal., 77 Cal.App.3d 20, 143 Cal.Rptr. 3651 (1978). Delayed public involvement in the EIR process precludes true project flexibility. RTM has repeatedly requested that Scripps Memorial Hospital consider allowing Arby's Restaurant to remain on the site. RTM's proposal is a technically feasible mitigation of the significant impacts caused by business displacement. Scripps Memorial Hospital has shown no project flexibility.

We hope that the City of Chula Vista will use this EIR process to assure project flexibility. Given the significant impact of the business displacement contemplated by the current proposal, CEQA requires flexibility that cannot be avoided merely because project design changes are inconvenient at this time.

2. Land Use/Community Character.

The scope of the Land Use/Community Character section of the EIR should include the proposed redevelopment project's consistency with the Town Centre II Redevelopment Plan. We recommend an analysis be undertaken of the proposed redevelopment project's consistency with the stated desire of the Town Centre II Redevelopment Plan to "facilitate the retention and expansion of as many of the existing commercial enterprises as possible through redevelopment activities and to encourage the participation of both owners and business operators in the revitalization of both the Project and Amendment Areas."

Conformity with applicable Chula Vista plans requires more than considering whether the proposed hospital expansion

Ms. Maryann Miller
June 28, 1990
Page 5

7. Conclusion.

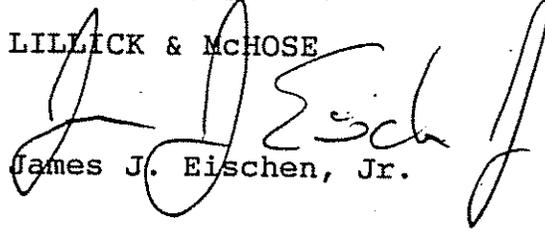
RTM is concerned that the EIR process in this matter has unfortunately precluded adequate and meaningful public comment on the proposed Scripps Memorial Hospital expansion. This has apparently prevented a more flexible approach to mitigating significant impacts.

RTM requests that the proposed redevelopment project's negative impacts dismissed in this letter be fully evaluated. Project flexibility will be required to mitigate significant impacts such as business displacement.

Thank you for your consideration.

Very truly yours,

LILLICK & MCHOSE


James J. Eischen, Jr.

JJE:wpc
W184:LTR0082F90

cc: J. Russell Welch
Charlie Harmon
Gayle McLeod

Case No: IS-90-35

Dr. Llewellyn Lieber
475 Fourth Ave Unit E
Chula Vista,
California 92010

12 Feb. 1990

Environmental Review Coordinator
P.O. Box 1087
Chula Vista,
California 92012

REPLY TO NOTICE OF INITIAL STUDY

The attached article from the Harvard Business Review (HBR in my notes) dated May/June 89 is highly relevant to the Environmental Impact of the hospital expansion project proposed by Scripps Memorial Hospital on 435 H St., Chula Vista.

A-3. The proposed expansion from 159 to 258 beds may be creating a "dinosaur" (HBR p. 111) for hospitals have experienced that bigger is not better since "...seven chains declared bankruptcy or suspended debt-service payments in 1987" (HBR p.105). Only a few years ago Bay General Hospital located at 435 H St. was rescued from bankruptcy because Scripps bought it. Will history repeat itself leaving Chula Vista with a dinosaur in the heart of town after suffering many months of environmental damage as outlined below?

"In 20 years, health care will be concentrated in the home and in the residential community, not on the hospital campus. (HBR p.197)...Dallas and Los Angeles doctors established their own ambulatory and chronic-care services, including "surgicenters" and free-standing reference laboratories. (HBR p.108)...As the Medicare program shifts to...chronic-care and...HMO's ... span the gap between acute and chronic care...more cost effective health care...rests on community-based ambulatory and chronic-care services (HBR p.110)...often located off-campus...Those hospitals that recognize the shift in societal priorities can plan to adapt their program and facilities to meet these new needs." (HBR p.111)

Community Hospital is planning to enlarge again. The environmental impact there will not be so great. Being surrounded by huge new housing developments and located as the southernmost hospital, there will be a need for service to the new and expanding area. Scripps does not need to enter into a competitive stance with Community Hospital by enlarging out, instead needs to plan new programs/facilities for ambulatory/acute-care services which require less land, fewer buildings/parking areas and less pollution of the environment.

B Proposed Project

1) Deed 14,986 s.f. to the School District in return for 20,460 s.f. for an access road to "G" St. by creating a road through the school's athletic field.
(C-3)

2/15/90
3/1/90
3/1/90
3/1/90

It is said (*) that ten new classrooms will be built in the proposed mitigation to be located on 5th Ave. next to the present school. (*) (This is not contained in the material I saw at the Planning Department. In fact, the Plan shows a huge parking lot in Phase I and a 5-story garage in Phase II on that ground). So, will the classrooms be built elsewhere? Building the road and the classrooms will create environmental damage as outlined below.

3) Entry from "H" St. is further addressed in C-8 as: "H" St. widening. From where is the ground for the proposed widening to come? By "eminent domain" on "H" St.? Will they take ground from the new Chula Vista Shopping Center...Rose of Lima Church...the County Courthouse Complex...the Scripps Memorial Hospital where submitted plans indicate retention of most of the trees on "H" St.? How many blocks must be widened? The environmental impact is described below.

6. Current Land Use

a) The current 159 bed hospital was nearly bankrupt when acquired by Scripps' management. Expanding to 258 beds with added costs for medical and parking buildings plus mitigation expenses could invite bankruptcy again. Statistics indicate a low rate of hospitalized patients in the 1990's (HBR p.111) not the projected 10% to 20% per year increase Scripps anticipates (3-g).

C Project Characteristics

5) Approximately 65 additional permanent employees projected. In what year, 2010? No figure is given for the number of employees eliminated/displaced if the current business establishments are removed (Service Station, Arby's, Kid's, Bank, Medicare, Vacant Pad Building, Farrell's, Cinema, Skateland). Certainly more than the 65 additional employees Scripps might employ. This could mean lost revenue and lost jobs for Chula Vista depending on the reaction of the businesses.

That Vacant Pad Building could make an ideal and much-needed Supermarket (as it was at one time). The City Council planned on such use until Scripps submitted their plans (Star-News, 16 Aug. 1989) A Supermarket would increase employment by more than 65 employees immediately, not in the year 2010(?) Much less environmental damage, too!

All the present businesses are serving Chula Vista very well in a central location where they are needed and utilized. Service Stations are closing and few remain in Chula Vista. The Bank is ideally located and well patronized. Arby's and Kid's fast food restaurants are the most accessible in the vicinity. (Arby's just spent a great deal of money landscaping and updating their parking area. It is a beauty spot now. They are good neighbors.) Farrell's, the Cinema, and Skateland offer many positive benefits to the teenagers and adults of all Chula Vista. I understand the school has some complaints, but school is in session only short periods while businesses like the above are operated continuously all year for many hours daily benefiting the total public not just the school children. If there are school problems, the public doesn't have to be scapegoats. As to the ten new classrooms, they could be built anywhere. I don't see them on the Plan. So the School District may benefit, but the school may not.

The businesses central location is vitally important. And they enjoy a symbiotic relationship. If isolated by the proposed removal this symbiotic relationship would end and possibly result in their demise with resultant loss of revenue for the city. Will Scripps pay \$270,000 yearly (as reported) during the construction period? When will such an amount be paid?

The Redicare Service is exactly the care projected in the Harvard Business Review article. Also, we have the Sharp-Rees-Stealy Medical Group, Inc. on 3rd Ave and "H" as well as the South Bay Ambulatory Surgery Center on Landis which provide such care. We already have specialized mental and drug treatment facilities and we have the expanding Community Hospital. Is a bigger Scripps Hospital with the attendant environmental problems noted below a possible dinosaur?

C. Project Characteristics

1) Emission pollutants (hydrocarbons, sulfur, dust, etc.):

Emissions from cars and trucks (a) 1010 parking spaces in the new garage;

(b) estimated 8,592 automobile trips per day. (C-7)

No mention is made of the additional traffic on a widened "H" St. The intersection at 4th and "H" was just widened. It is probably the busiest intersection in Chula Vista. Six bus lines use it. We have bumper-to-bumper stop-light to stoplight traffic in the morning and evening. Such traffic on "H" St. can only increase with the building of new housing and the "Mile of Cars" to East Lake. Imagine what an enlarged hospital would create... Gridlock! That means more noise, fumes, pollution from idling engines and soon we'll have L.A. smog over the City's heart. Additionally, a new 5-story garage on 5th would pose a large safety hazard for students and pedestrians as well as create gridlock on the dead-end at 5th and "H" St.

Glossed over is the amount of dust from excavating 35,000 c.f. of dirt (not including ten classrooms); filling from 7-10 ft deep for the parking lot (17,250 c.y); removal of most of the trees and vegetation which could help hold down the dust and pollution if left standing out will create more dust when being removed.

There are trenches to be dug/filled for additional sewers, power lines, water pipes, etc., creating more dust. Should problems evolve during excavation of the buried tanks known to be there more dust and chemical pollutants could be released.

No mention is made of burning hospital wastes. Is burning done? How is waste disposed of? That could be a big impact. Hopefully, the emergency generator will not need to be used often thereby emitting diesel fuel pollutants.

But not all this construction will be done at once. We neighbors will have to live through it twice..in two phases (no time noted for the second phase). We've lived through the building of the two medical buildings on 4th and "H" as well as the widening of of the intersection of 4th and "H", plus the creation of the new Chula Vista Shopping Center by closing off 5th Ave. We don't need to go through it twice more just to create a dinosaur.

3. Noise generated

a) noted in the IS Study as "minimal" and "minor"

When you don't live with screaming sirens (hospital, fire, police sheriff), noisy helicopters, heavy bus/vehicular traffic for 24 hours a day, then noise may seem "minimal". But it can be nerve wracking especially at midnight when they all respond to an emergency like jail riots/breaks at the County Court Building at 3rd and "H". We really don't want any more sirens/traffic! The newer concept of out-patient, home care "can be delivered anywhere...not necessarily on campus" (HBR p.107). Scripps should make plans for such a concept instead of a dinosaur hospital.

C-4 indicates no open space is planned. Beauty will be lost as well as a chance to help clear the air of pollutants with trees.

D Environmental Setting

4-b Trees

According to the submitted Plans, most of the existing trees will be removed. Some will be replaced (new growth vs old growth vs pollution removal capability) ...the environment loses! The Plan shows 9 trees on "H" St. will remain, but for how long? If "H" is widened, where does the land come from? Do the trees go, too?

On 5th Ave. the Plan shows 6 trees to remain, but for how long? Phase I perhaps? Phase II shows a 5-story office building and a five-level garage on 5th Ave. which eliminates the trees and two others presently standing between the Bank and Farrell's. With no open space; little beautification of the grounds; and removal of trees, environmental destruction is taking place!

Until Phase II, the Bank will remain. But a 5-story office building will be built where the Redicare Center stands in Phase I. We need the Redicare Center but we don't need a 5-story office building. There are plenty of empty office buildings available with more being built all the time. Two presently exist on 4th and "H" abutting Scripps.

The Plan for Phase I shows lots of open space but no new classrooms. If the ten new classrooms were built adjoining the school grounds, then the pupils would be subjected to large doses of noise and pollutants which could be very disruptive of classes and bad for the pupils' health. Ambulances would exit on two sides of the school and drive along the other two sides with sirens going.

How realistic is the Scripps Plan?

If the enlargement necessitates displacement/relocation/termination of the present eight healthy, revenue producing businesses, how much income would Chula Vista secure from Scripps Memorial Hospital's projected 13.5 acres of land during construction in each Phase? How long will it take to make up any lost revenue keeping in mind that this destruction/construction is in two phases...each creating dust, noise, loss of revenue(?) until the Ultimate Plan is achieved. Over the long haul, would the present businesses (plus a Supermarket in the Vacant Pad Building) bring greater revenue to the city without all the pollution and disruption? The hospital is quoting \$270,000

vs the current \$72,000 received (with a large empty building which could be a revenue producing Supermarket). How is that \$270,000 figured? Every year from now on or only at completion of Phase II (in 2010?)? What if they go bankrupt as the Harvard Business Review predicts for dinosaurs?

It appears that Phase II will eliminate the existing one-story hospital/parking space to build a three story administration building. This would connect with the present four-story/basement hospital building. That, in turn, would connect with a new two-story/basement hospital building by the school grounds.

Maybe that is where the whole plan should end? But instead of a three-story administration building make it a five-story/basement administration and parking garage. And instead of the new two-story/basement hospital, they could build a five-story/basement hospital? The complex would extend in a line from "H" St. toward "G" St. and present a symmetrical picture of 5-4-5 story buildings all connected to one another with ample parking, hospital and administration accommodations by building up instead of out and still have three more hospital floors than at present. It is cheaper to add to a structure than all-new construction would be. And the City would still have all the present businesses plus a Supermarket (?) to receive revenue from. It would not adversely affect the present businesses since Scripps already owns all that land on which to build, I believe. If they still wanted the street through to "G" that could involve new classrooms to be built elsewhere. What a lot of noise, pollution, and dust would be eliminated! Maybe it could all be done in one phase? The City would be much richer, the air cleaner, the businesses happier, the people supplied with life's necessities and pleasures, even with a Supermarket! Everybody wins!

Send the Plans back to the drawing board. In five years "The community hospital will decentralize its services and weave them into the neighborhood and community...for diagnosis and treatment of the chronically ill...relocating resources from acute-care (HBR p.111)..because of frozen Medicare payments, massive underwriting losses of insurers, and renewed growth of managed-care plans." (HBR p.108).

In 1985 there was a 20% decline in inpatient use nationwide...while... Declining margins, excess capacity, mature products portfolio, bureaucratic overburden, poorly planned diversification moves, rapid CEO turn-over...may finally produce the long-predicted closure of 700 to 1,000 institutions in deepest trouble (HBR p.104)...The acute-care hospital...will probably not survive...in the long term." (HBR p.105)

Save us from a dinosaur in Chula Vista!

Llewellyn Lieber Ph. D.
Dr. Llewellyn Lieber



CHULA VISTA CITY SCHOOL DISTRICT

84 EAST "J" STREET • CHULA VISTA, CALIFORNIA 92010 • 619 425-9600

EACH CHILD IS AN INDIVIDUAL OF GREAT WORTH

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INTERIM
SUPERINTENDENT

JOHN F. VUGRIN, Ph.D.

January 30, 1990

FEB 2 1990

Mr. Doug Reid
Environmental Review Coordinator
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

RE: Case No. IS-90-35
Applicant: Scripps Memorial Hospital
Location: 435 "H" Street
Project: Scripps Hospital Expansion

Dear Mr. Reid:

Schools in the Chula Vista City School District are overcrowded and the District has added 25 relocatable classrooms over the past three years to assist in accommodating growth. Students are also being bused outside their attendance area boundaries to help alleviate this situation, and to help achieve ethnic balance.

Please be advised that this project is located in the Vista Square School attendance area. A developer fee of 12¢ per square foot is currently being charged to help provide facilities.

If you have any questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Kate Shurson".

Kate Shurson
Director of Planning

KS:dp

Initial Study
IS 90-35

CHULA VISTA FIRE DEPARTMENT
BUREAU OF FIRE PREVENTION

Scripps Hosp.

PLAN CORRECTION SHEET

Address 435 H St. Plan File No. _____ Checker Low Date 2/1/90

Type Constr. _____ Occupancy _____ No. Stories _____ Bldg. Area 180,000 #

The following list does not necessarily include all errors and omissions.

PROVIDE AND SHOW ON PLAN:

- 1- All buildings shall be provided with an approved standpipe and fire sprinkler system, including parking structures.
- 2- Additional fire hydrants will be required.
- 3- Fire alarm system required.
- 4- All State Fire Marshal CCR-Title 19 regulations shall be met.

H. FIRE DEPARTMENT

1. What is the distance to the nearest fire station and what is the Fire Department's estimated reaction time? 1 mile - 3
minutes
2. Will the Fire Department be able to provide an adequate level of fire protection for the proposed facility without an increase in equipment or personnel? yes
3. Remarks See Plan Correction sheet

Cloue
Fire Marshal

2/1/90
Date

H-1. PARKS & RECREATION DEPARTMENT

1. Are existing neighborhood and community parks near the project adequate to serve the population increase resulting from this project?

Neighborhood _____
Community parks N/A

2. If not, are parkland dedications or other mitigation proposed as part of the project adequate to serve the population increase?

Neighborhood _____
Community parks N/A

3. Does this project exceed the Parks and Recreation Thresholds established by City Council policies?

N/A

Shocin Stokes
Parks and Recreation Director or
Representative

1/26/90
Date

Sweetwater Union High School District

ADMINISTRATION CENTER
1130 FIFTH AVENUE
CHULA VISTA, CALIFORNIA 92011
(619) 691-5553

PLANNING DEPARTMENT

June 4, 1990

JUN 7 1990

Mr. Robert Leighter
Planning Director
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

Dear Mr. Leighter:

Re: Notice of Preparation of an Environmental Impact Report
EIR-90-07

The Sweetwater Union High School District is in receipt of your May 29, 1990, Notice of Preparation of an Environmental Impact Report, and as a responsible agency we would like to respond to the following areas of concern:

1. Land Use

The following three areas have been discussed with the hospital regarding the expansion:

- a. The deeding over to the Sweetwater Union High School District of property as identified in Exhibit B in order to facilitate the construction of future classrooms. The hospital has agreed to provide a common driveway with access from Fifth Avenue and provide District vehicular access to the rear portion of the school. This rear access is required by the City of Chula Vista's Fire Marshal.
- b. During previous developments, a large storm drain was constructed from Fourth Avenue to the southeast corner of the school site. The current affect of this drainage is to flood both the athletic and classroom areas of the junior high school. To mitigate this impact, this drain needs to be ducted into the hospital's proposed storm drain system.

Mr. Leighter
June 4, 1990
Page 2

- c. At the request of the City of Chula Vista and Scripps Hospital, the District has agreed to provide a thirty foot right-of-way from the Chula Vista Junior High School campus southeast corner to "G" Street. This right-of-way needs to be shielded in order to provide pedestrians visual eye contact with the athletic field. This provision of right-of-way availability is contingent upon the District's sale of its current "handball court area" (approximately 22,000 square feet).

2. Development Impact of Enrollment

The construction of approximately 521,000 square foot calculates into 312 new students. This will need to be mitigated prior to the issuance of the building permit and construction. This can be potentially mitigated by inclusion into our Community Facilities District No. 5.

Sincerely,



Andrew B. Campbell
Administrator of Planning

ABC:mr

SWEETWATER AUTHORITY

505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 92012-2328
(619) 420-1413



February 8, 1990

GOVERNING BOARD
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CONTROLLER-SECRETARY

Mr. Douglas Reid
Environmental Review Coordinator
City of Chula Vista Planning Department
P. O. Box 1087
Chula Vista, CA 92012

Subject: CASE IS-90-35
SCRIPPS HOSPITAL EXPANSION
SWA FILE: CITY OF C.V. - GENERAL

Dear Mr. Reid:

This is in response to your Notice of Initial Study for the above subject case. Based on preliminary discussion with the Chula Vista Fire Department regarding fire flows, the Authority's existing water system will require upsizing to meet their requirements. The extent of the water system improvement is not known at this time.

The developer will need to submit plans of the proposed development to the Authority, along with a deposit for engineering design. We can then determine the method of service and extent of system improvements.

If you have any questions, please contact Mr. Jim Smyth at 420-1413.

Very truly yours,

SWEETWATER AUTHORITY

Richard A. Reynolds
Chief Engineer

RAR:JLS:ln

n/letters/scripps

FEB 9 1990

Sweetwater Union High School District

ADMINISTRATION CENTER
1130 FIFTH AVENUE
CHULA VISTA, CALIFORNIA 92011
(619) 691-5553

PLANNING DEPARTMENT

February 5, 1990

Mr. Douglas D. Reid
Environmental Review Coordinator
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

Dear Mr. Reid:

CASE NO: IS-90-35
DESCRIPTION: Phase I - Hospital expansion from 159
beds to 258 beds in 120,000 g.s.f. and
60,000 sq. ft. Medical Office Bldg. Ultimate
plan - Hospital expansion to 470,484 s.f.,
increase of medical offices to 124,500 s.f.,
construction of 775 space office parking
structure.
LOCATION: 435 "H" Street, Northeast corner of 5th & "H"
APPLICANT: Scripps Memorial Hospital

If the above subject project requires the construction of new
building space payment of commercial/industrial school fees
will be required. Fees are not required for tenant
improvements which do not result in new habitable area.

If you have any questions, please do not hesitate to contact
me at 691-5553.

Respectfully,


Thomas Silva
Director of Planning

TS/ml

FEB 7 1990

February 12, 1990

TO: Chris Salomone, Director of Community Development
FROM: Sid W. Morris, Deputy City Manager *SWM*
SUBJECT: Scripps Expansion

Chris:

In a recent discussion with Gena Franco, Associate Civil Engineer, she asked me whether sewer capacity had been reevaluated as part of the proposed Scripps Hospital expansion project. Further, she informed me that the sewer capacity remained unchanged and was not upgraded as a part of the Chula Vista Center expansion and at the time of that project, was nearing capacity. Would you please ensure, if it has not already occurred, that sewer capacity for this project is reevaluated and appropriately planned for?

SWM:lm

cc: John Goss, City Manager
John Lippitt, Director of Public Works
Bob Leiter, Planning Director

#1/lm

MAR 13 1990

APPENDIX B
TRAFFIC ANALYSIS

TRAFFIC ANALYSIS
FOR
SCRIPPS MEMORIAL HOSPITAL
EXPANSION
Chula Vista, CA

October 19, 1990

Revised February 21, 1991

JN 03959:sg

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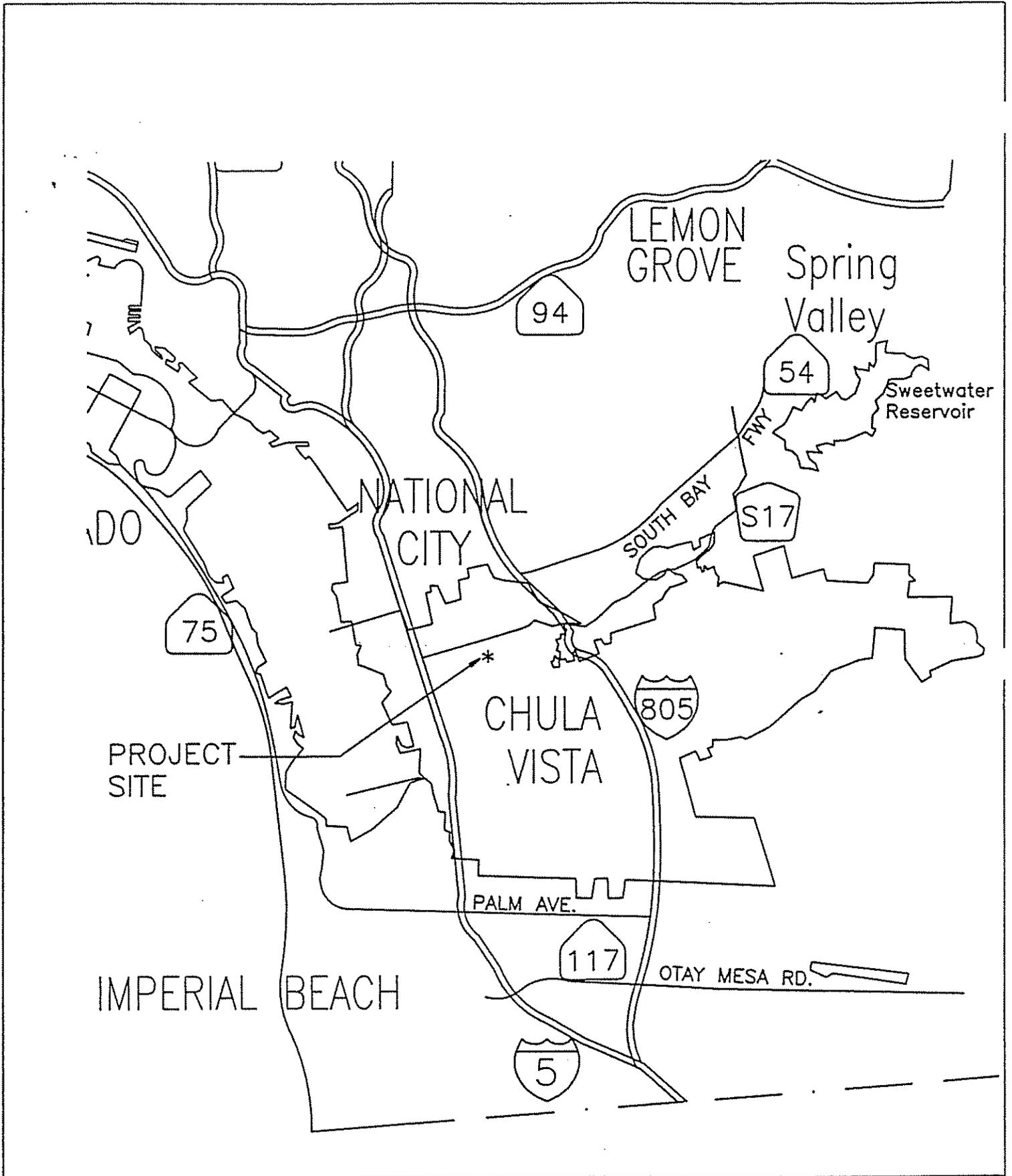
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INTRODUCTION

Scripps Memorial Hospital is proposing to expand the hospital on an 8.9 acre parcel west of the existing Scripps Hospital in the City of Chula Vista, as shown in figures 1 and 2. The applicant is seeking approval to expand the hospital with additional hospital facilities, parking structure and medical office spaces. This 8.9 acre parcel is located within the City of Chula Vista Ammended Town Center II Redevelopment Plan and currently is developed with commercial uses.

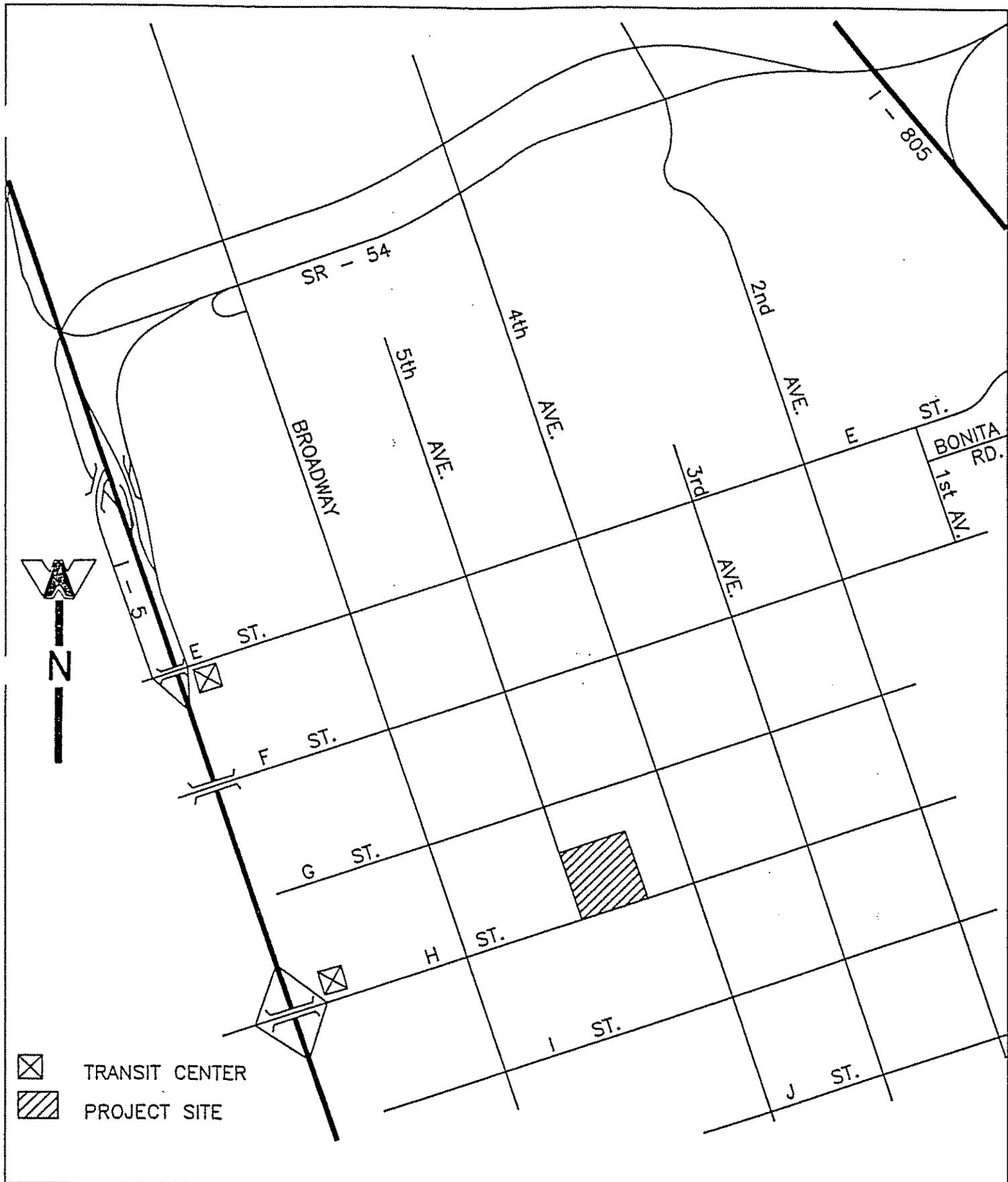
Willdan Associates has been retained to evaluate the potential transportation impacts which may occur due to the development under the proposed project. The analysis identified existing conditions, generates, distributes and assigns project trips (and displace the existing commercial uses trips) onto the street system, and suggests mitigation measures where adverse transportation impacts are identified. Short term cumulative impacts were identified by utilizing the year 1995 with "approved projects" travel forecasts prepared as part of the East Chula Vista Transportation Phasing Plan (ECVTPP). Long term impacts are also identified by using the City of Chula Vista's Land Use Scenario 4 travel forecasts prepared by SANDAG in 1988-89 for the General Plan update.



PROJECT LOCATION

FIGURE 1


WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6343 GREEDING DR., SUITE 250, SAN DIEGO, CA 92121



PROJECT VICINITY

FIGURE 2



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6363 GREEDYMOH DR., SUITE 250, SAN DIEGO, CA 92121

EXISTING CONDITIONS

Regional access to the project is provided from Interstate 5 and 805 via H street. Direct access to the project from 4th Avenue, 5th Avenue and H Street (see Figure 3). Figure 4 illustrates the most recent traffic count information available for the project vicinity streets. These traffic count data were provided by the City of Chula Vista.

Roadway Characteristics

H Street is classified by the City of Chula Vista's Circulation Plan as a six lane major street (six lanes, divided) between Interstate 5 and Third Avenue and a four lane major street (four lanes, divided) between Third Avenue and Hilltop Drive. Currently this roadway is constructed to four lanes divided street between Interstate 5 and 3rd Avenue and four lanes undivided between 3rd Avenue and Interstate 805. H Street is currently carrying between 23,800 and 30,100 average daily trips (ADT).

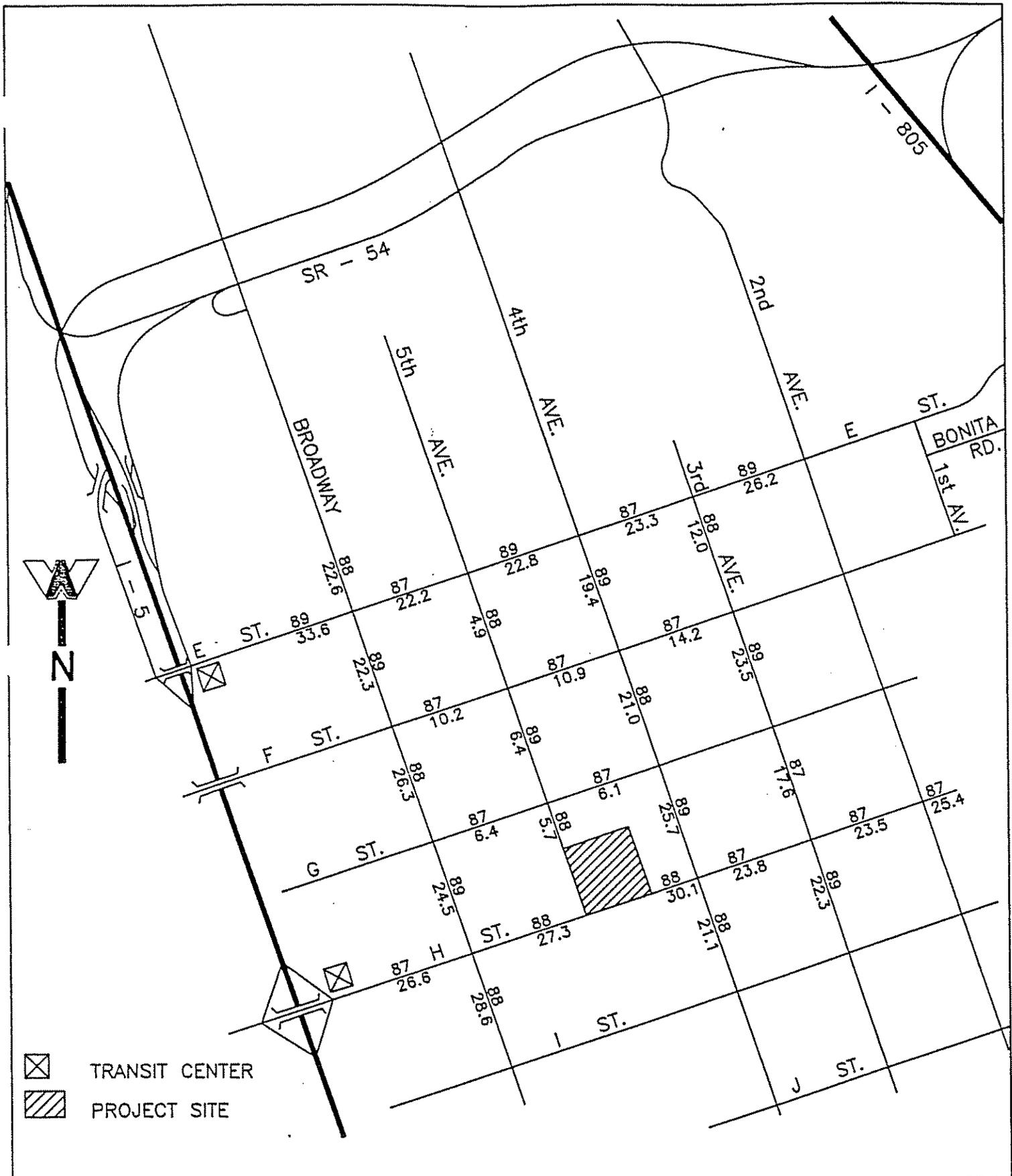
G Street is classified as a class II collector (two lanes with two-way center turn lane) and currently is constructed to two lanes undivided street. G Street is currently carrying 6,100 ADT east of 5th Avenue and 6,400 ADT west of 5th Avenue.

E Street is classified as a four lane major between Interstate 5 and Broadway and class I collector (four lanes with two-way center turn lane) between Broadway and 3rd Avenue and currently is constructed to four lanes divided between Interstate 5 and Broadway and four lanes undivided between Broadway and 3rd Avenue. E Street is currently carrying 33,600 ADT between Interstate 5 and Broadway and 22,200 ADT between Broadway and 3rd Avenue.

Fifth Avenue is classified as a class II collector (two lanes with two-way center turn lane) and currently is constructed to two lanes undivided between E Street and H Street. Fifth Avenue is currently carrying between 4,900 and 6,400 ADT between E Street and H Street.

Broadway is classified as a four lane major street (four lanes, divided) and currently is constructed to four lanes undivided between E Street and G Street and four lanes divided between G Street and I Street. Broadway is currently carrying between 22,300 and 28,600 ADT between E Street and I Street.

Fourth Avenue is classified as a class I collector (four lanes with two-way center turn lane) and currently is constructed to four lanes undivided between E Street and F Street and between H Street and I Street. Also, 4th Avenue is currently constructed to four lanes divided between E Street and H Street.



EXISTING ADT'S (87-89)
IN THOUSANDS

FIGURE 4



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
8363 GREENBUSH DR., SUITE 250, SAN DIEGO, CA 92122

Existing Intersection Operations

Intersections are of particular interest since the level of service at which an intersection operates is an indication of the delay which can be expected on the overall system. Additionally, the intersection analysis is based on peak hour conditions which more accurately reflect the traffic conditions on the street network. The intersections in the vicinity of the proposed project specified by the City staff for analysis are as follows:

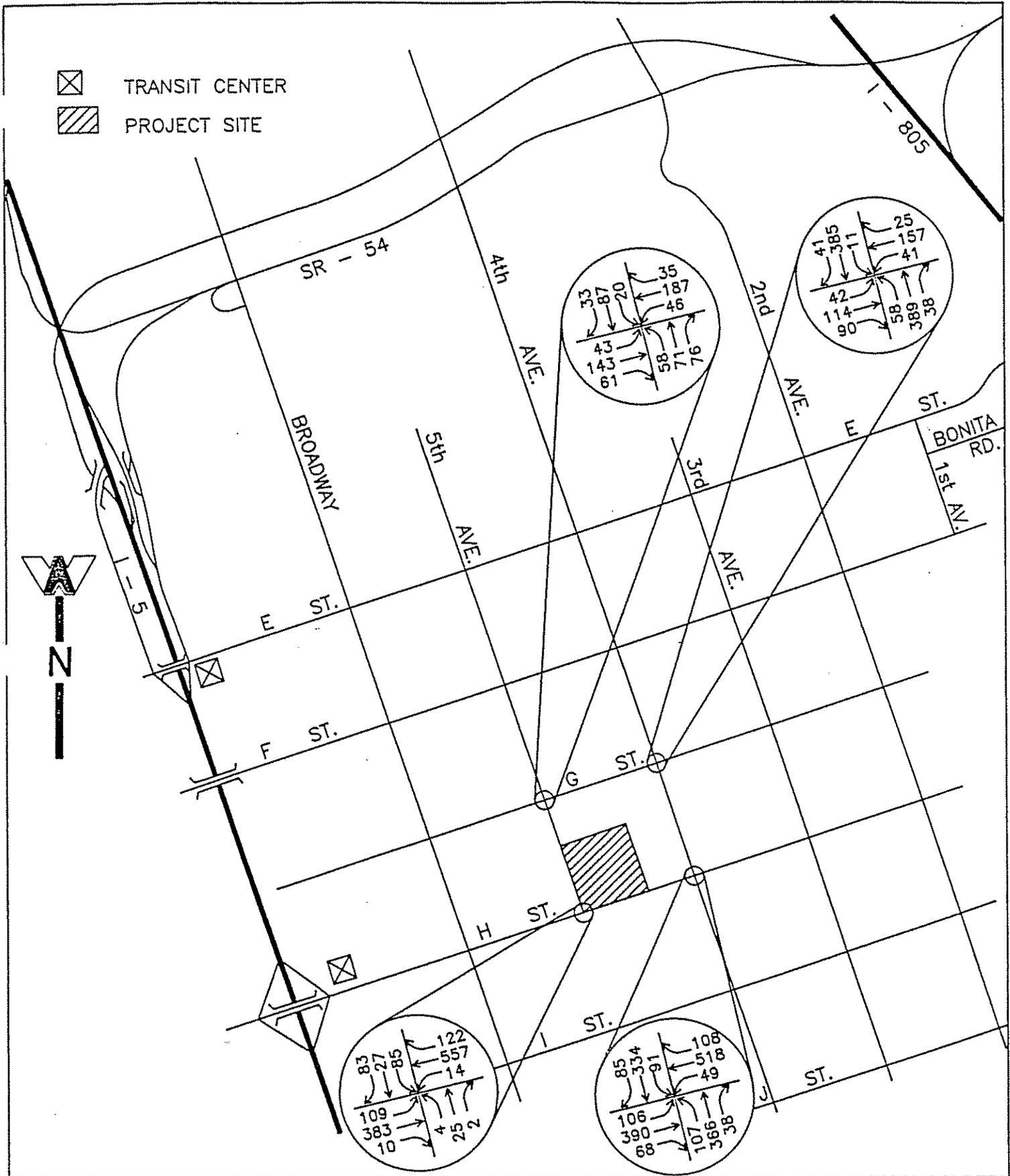
- ◆ H Street/5th Avenue
- ◆ H Street/4th Avenue
- ◆ G Street/5th Avenue
- ◆ G Street/4th Avenue

The existing conditions at these intersections were analyzed for morning and evening peak hours using manual peak hour turning movement counts taken by Willdan and counts furnished by the City. Figures 5 and 6 illustrate the existing morning and evening peak hour turning movements at the intersections analyzed. Figure 7 illustrates the existing lane configurations for these intersections.

Table 1 summarizes the analysis of the peak hour level of service for the intersections listed above. The signalized intersections were evaluated using the Intersection Capacity Utilization (ICU) methodology specified by the City of Chula Vista. Hourly lane capacities of 1,500 and 1,700 for turn lanes and through lanes, respectively were used in this analysis. The lost time allowance calculation factor is 0.10. The analysis worksheets along with a description of conditions and ICU value ranges for the various levels of service are included in the Appendix.

As shown on Table 1, all of the intersections are operating at LOS C or better under existing morning and evening peak hour conditions. However, it should be noted that narrow lane widths on "H" Street west of 4th Avenue along with turning movements to and from the shopping center south of "H" Street tend to create side friction and affect capacity in this corridor. Specifically, "H" Street west of 4th Avenue has substandard geometrics at this time. The north side of this roadway consists of two ten foot travel lanes and a five foot sidewalk immediately adjacent to an apartment wall. Besides reducing capacity adjacent to the "H" Street/4th Avenue signalized intersection, drivers tend to feel "cramped" and unsure of overall roadway conditions. This situation prohibits the possibility of eastbound to westbound U-turns at 4th Avenue.

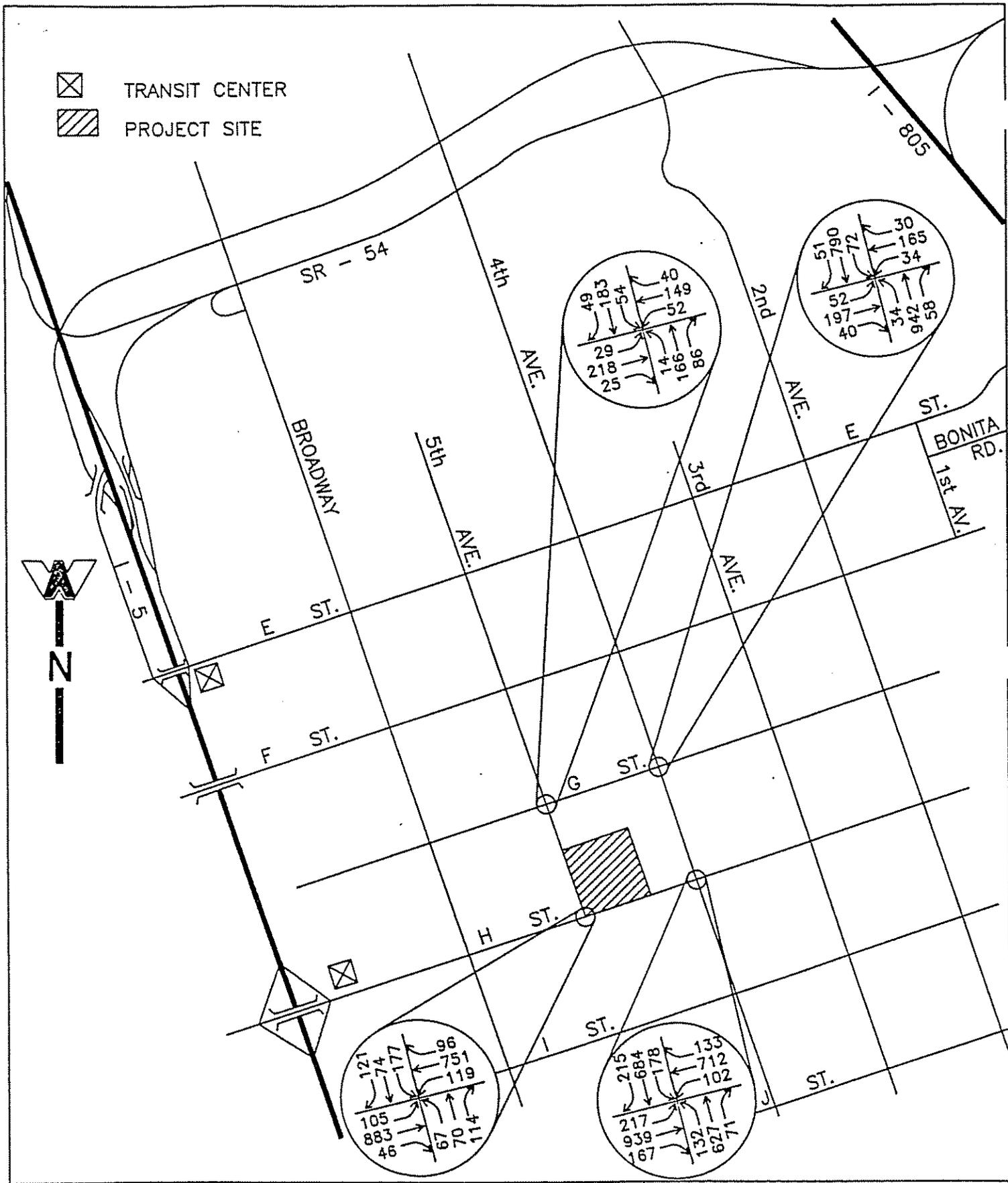
- ☒ TRANSIT CENTER
- ▨ PROJECT SITE



EXISTING AM PEAK HOUR
TURNING MOVEMENTS

FIGURE 5

W WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
8343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

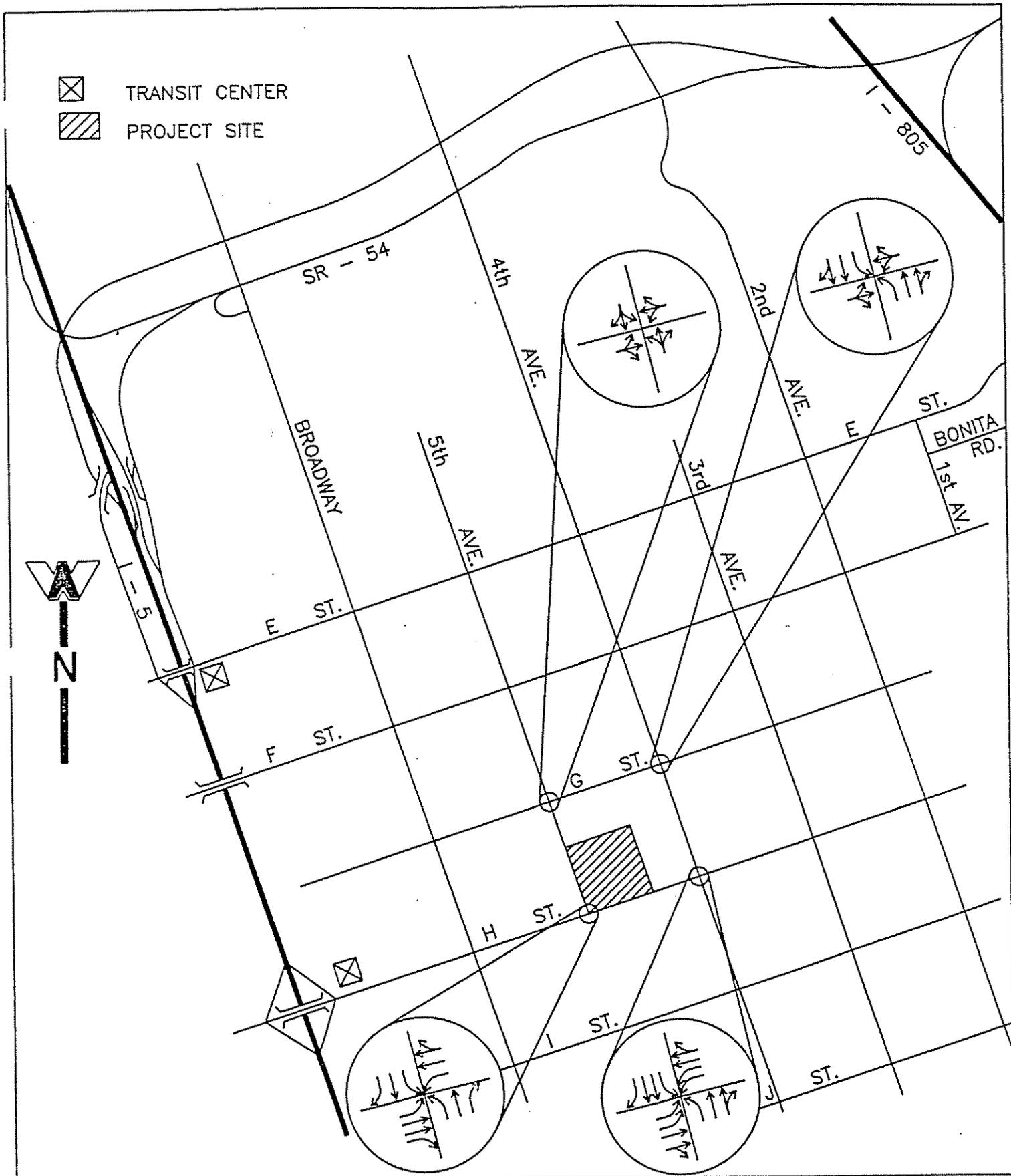


EXISTING PM PEAK HOUR
TURNING MOVEMENTS

FIGURE 6



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122



EXISTING LANE CONFIGURATION

FIGURE 7

W WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6363 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

Table 1				
Existing Level of Service				
Intersection	AM Peak		PM Peak	
	ICU	LOS	ICU	LOS
H Street/5th Avenue	0.44	A	0.60	A
H Street/4th Avenue	0.50	A	0.78	C
G Street/5th Avenue	0.42	A	0.47	A
G Street/4th Avenue	0.43	A	0.63	B

IMPACTS

To evaluate the potential impacts on the surrounding street system, we have estimated the trips expected to be generated by the proposed project. The existing commercial uses trips were then displaced by the proposed project trips. The proposed project trips were then distributed and assigned to the street system and project vicinity intersection capacities were evaluated under short term cumulative year 1995 conditions for operational performance.

Trip Generation

The traffic which will result from the redevelopment of the site under the proposed project designation and the existing commercial uses are estimated using accepted trip generation rates and peak hour factors. These are based on categories of land uses and are summarized in SANDAG's *Traffic Generators* manual. Tables 2 and 3 summarizes the generation of existing uses trips and proposed uses from the project site, respectively.

As shown in Table 2, the existing commercial uses would generate 7,814 ADT with 416 trips occurring during the AM peak hour and 661 trips occurring the PM peak hour. The Scripps Hospital expansion would generate 4,980 ADT under Phase 1 and a total of 9,015 ADT under cumulative Phases 1 and 2 development. Therefore, the proposed project would add 1,201 ADT to the existing traffic with an additional 244 trips occurring during the AM peak and an additional 282 trips occurring during the PM peak hour. It should be noted that the existing uses are commercial and capture existing "passerby" trips already on the street network. Therefore, instead of a net decrease in traffic under Phase 1 expansion, there would likely be no measureable change in trips generated from the project site.

Trip Distribution

The distribution of trips typically results from an estimate of ultimate travel destinations and routes used to reach those destinations. The basis for choosing a route is the drivers' consideration of time, distance and convenience. A major element is access to the regional circulation system and the interaction between residential, employment and retail land use centers.

In order to determine the distribution and assignment of trips for the proposed project, the existing turning movement counts at the project vicinity intersections were used. Figure 8 shows the project trip distribution to the surrounding street system.

Table 2
Trip Generation (Existing Land Use)

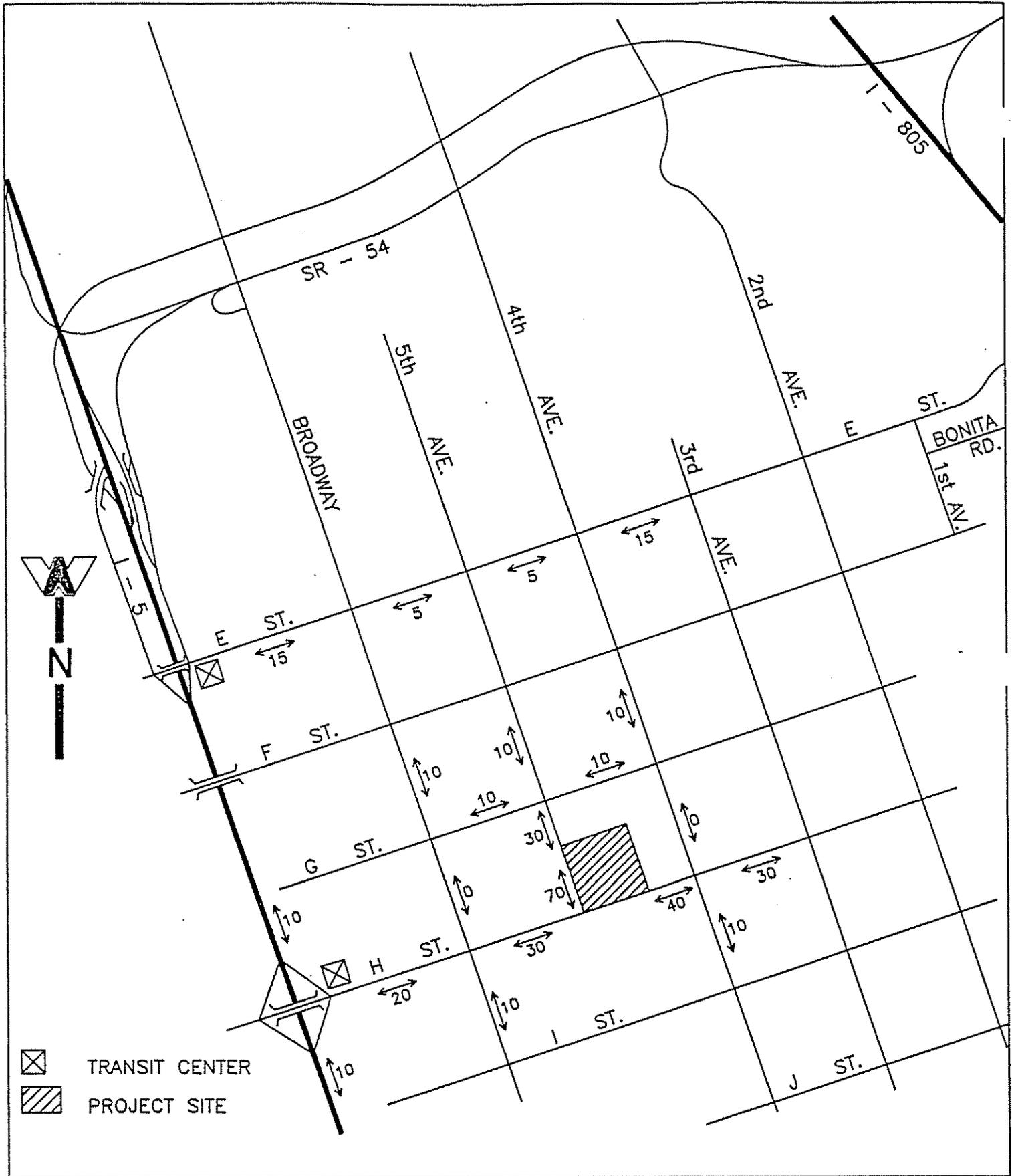
Existing Land Use	Intensity	Daily Trip Rate	Average Daily Trips	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Fiesta Cinema	9,350 SF	80/1000 SF	748	0.3	-	-	8	42	18
Farrells	5,600 SF	300/1000 SF	1,680	8	67	67	6	60	40
Readi Care Cnt (Med Ofc)	3,250 SF	50/1000 SF	163	6	8	2	10	5	11
First Interstate Bank (w/drive through)	6,750 SF	200/1000 SF	1,350	5	41	27	10	68	68
Captain Kidd's	1,950 SF	300/1000 SF	585	8	23	23	6	21	14
Arby's	2,450 SF	700/1000 SF	1,715	4	41	27	8	69	69
Express Gasoline	9 pumps	130/pump	1,170	6	35	35	12	70	70
Indoor Swap Meet ¹	80,600 SF	5/1000 SF	403	5	10	10	9	18	18
TOTAL			7,814		225	191		353	308

¹Warehouse Trip Generation rate was used.

Table 3

Trip Generation (Proposed Land Use)

Land Use	Intensity	Daily Trip Rate	Average Daily Trips	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Phase I Expansion:									
Hospital Expansion	99 beds	20/bed	1,980	9	142	36	11	65	153
Medical Office	60,000 SF	50/1000 SF	<u>3,000</u>	6	<u>144</u>	<u>36</u>	10	<u>90</u>	<u>210</u>
Subtotal			4,980		286	72		155	363
Phase II Expansion:									
Office	37,000 SF	20/1000 SF	740	14	92	11	13	19	77
Storage	37,000 SF	2/1000 SF	70	5	2	2	9	3	3
Medical Office	64,500 SF	50/1000 SF	<u>3,225</u>	6	<u>155</u>	<u>39</u>	10	<u>97</u>	<u>226</u>
Subtotal			4,035		250	52		119	306
TOTAL			9,015		536	124		274	669
Difference from Existing			+ 1,201		+311	-101		-79	+361



TRIP DISTRIBUTION

FIGURE 8


WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
8363 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

Short Term Impacts

It is anticipated that the proposed project will be constructed in phases (Phase I and ultimate). The ultimate buildout is expected in ten to fifteen years. Therefore, this analysis assume the Phase 1 expansion in the short term condition. The short term cumulative condition is analyzed under year 1995 conditions referencing the year 1995 SANDAG Series 7 forecast with eastern territories "approved projects" travel forecast prepared by Willdan Associates and included in the Eastern Chula Vista Transportation Phasing Plan (ECVTPP). The short term impacts took into account the construction of State Route 54 between Interstate 5 and Interstate 805. The traffic volumes resulting from the effect of development including the Scripps Hospital Phase One expansion for year 1995 are depicted on Figure 9. It should be noted that phase one of the project does not add traffic to the surrounding street network.

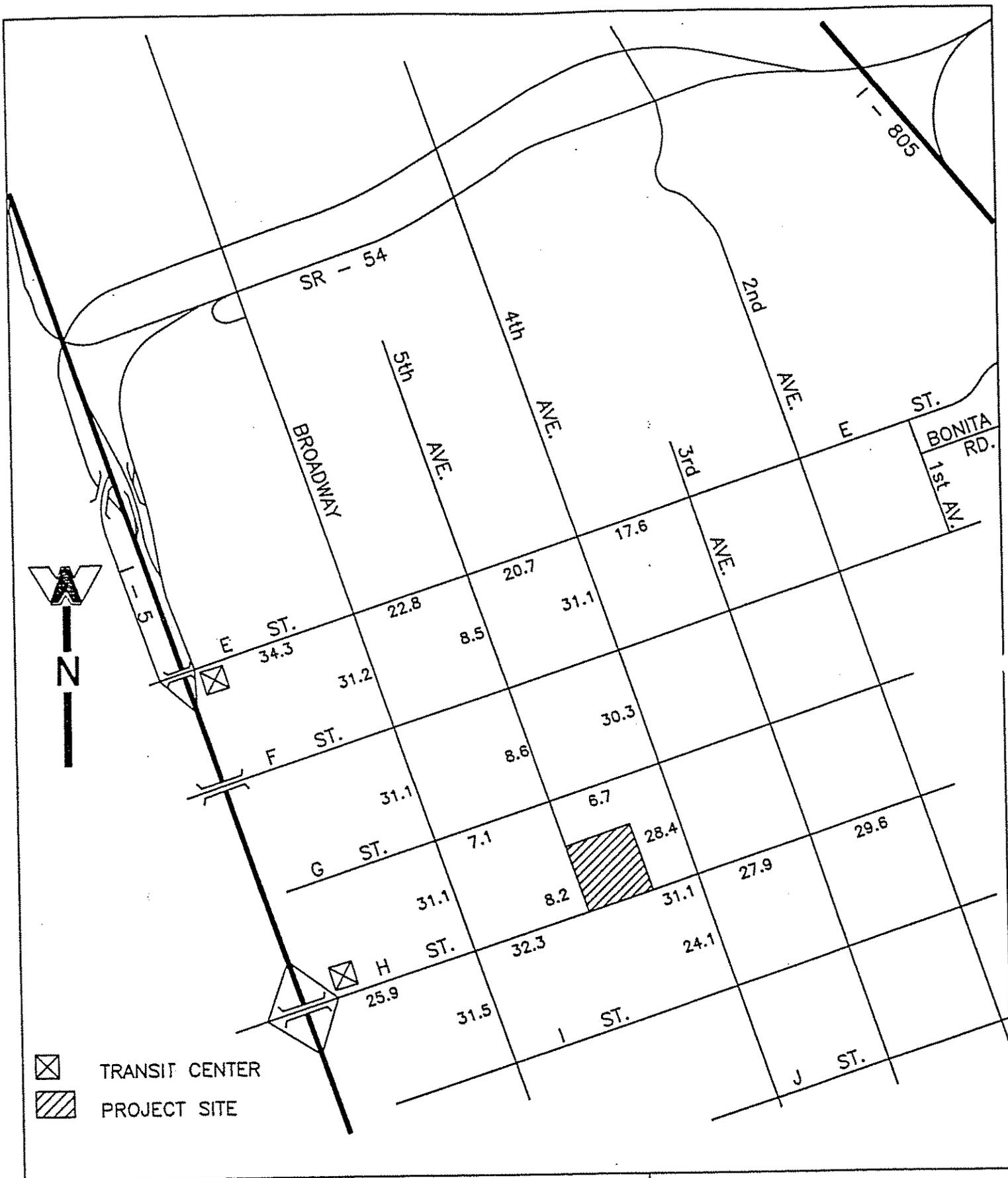
Intersection Analysis (Short Term Cumulative)

Figure 10 and 11 depict the morning and evening peak hour turning movements at the key intersections in the proposed project vicinity under year 1995 with Phase 1 expansion conditions. These were obtained by extracting peak hour directional link volumes from the aforementioned 1995 travel forecast and adjustment to reflect project access locations. Table 4 summarizes the analysis of the level of service for those intersections.

As shown on Table 4, all intersections would continue to operate at LOS A during the morning peak hour. During the evening peak hour, however, the intersections of H Street with 4th Avenue would operate at LOS D. However, if a third lane on the north side of "H" Street is provided, the operations at the "H" Street/4th Avenue intersection would improve. This would also allow for eastbound left turns along "H" Street at this location.

Street Segment Analysis (Buildout)

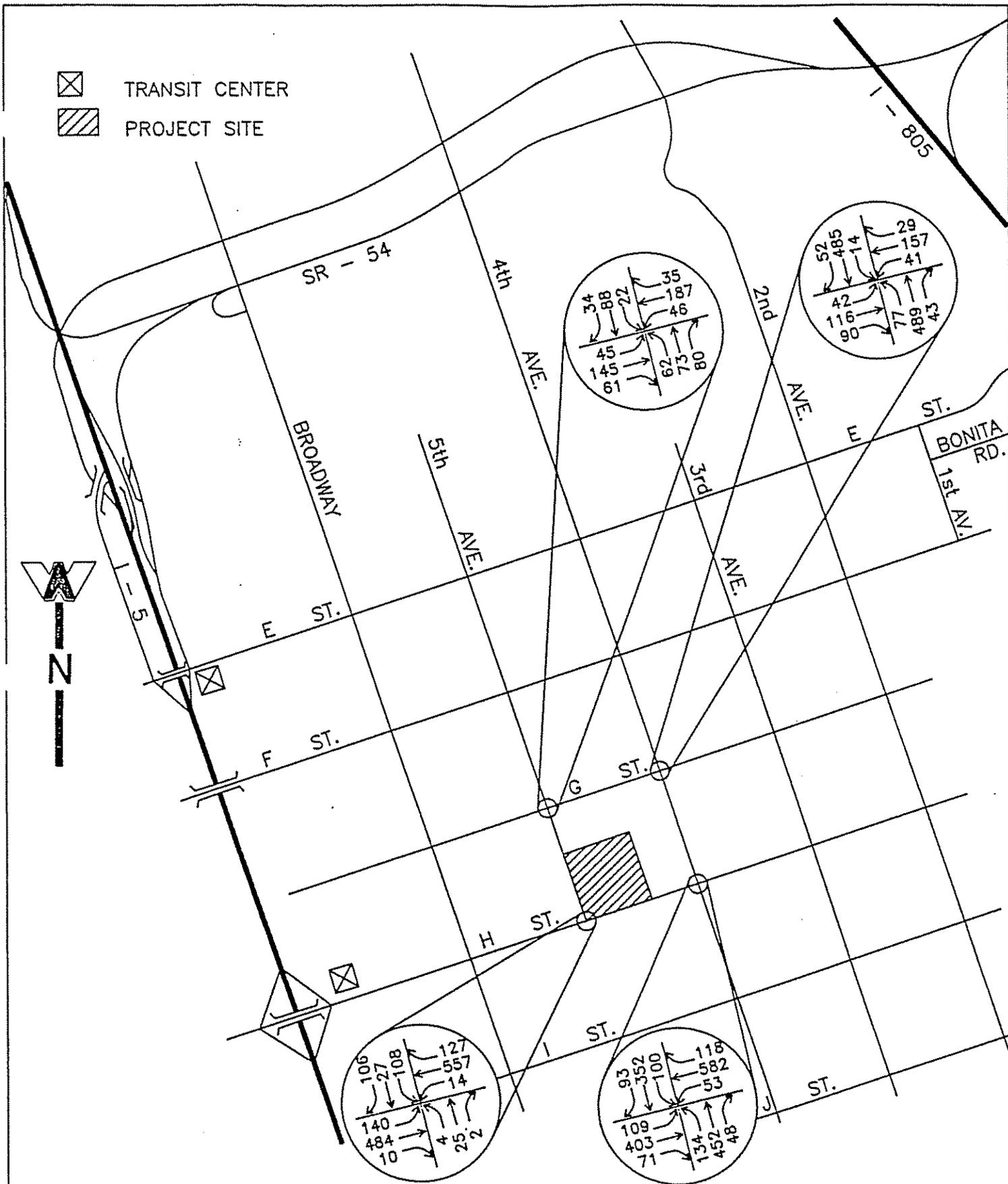
In order to evaluate the long term impacts as associated with the project, we have utilized the City of Chula Vista General Plan Scenario 4 buildout travel forecasts (SANDAG 3/10/89 forecast run). According to the buildout trip generation for the zone containing the Scripps Hospital (TAZ #573), there were 7,500 ADT assumed for the project uses. Since the proposed project is estimated to generate approximately 9,000 ADT under ultimate expansion, this yields a trip increase of 1,500 ADT over General Plan trip estimates for the project site. However, this is a conservative estimate due to the fact the commercial trips generated under the General Plan land



YR 1995 + PH I EXPANSION ADT'S
IN THOUSANDS

FIGURE 9

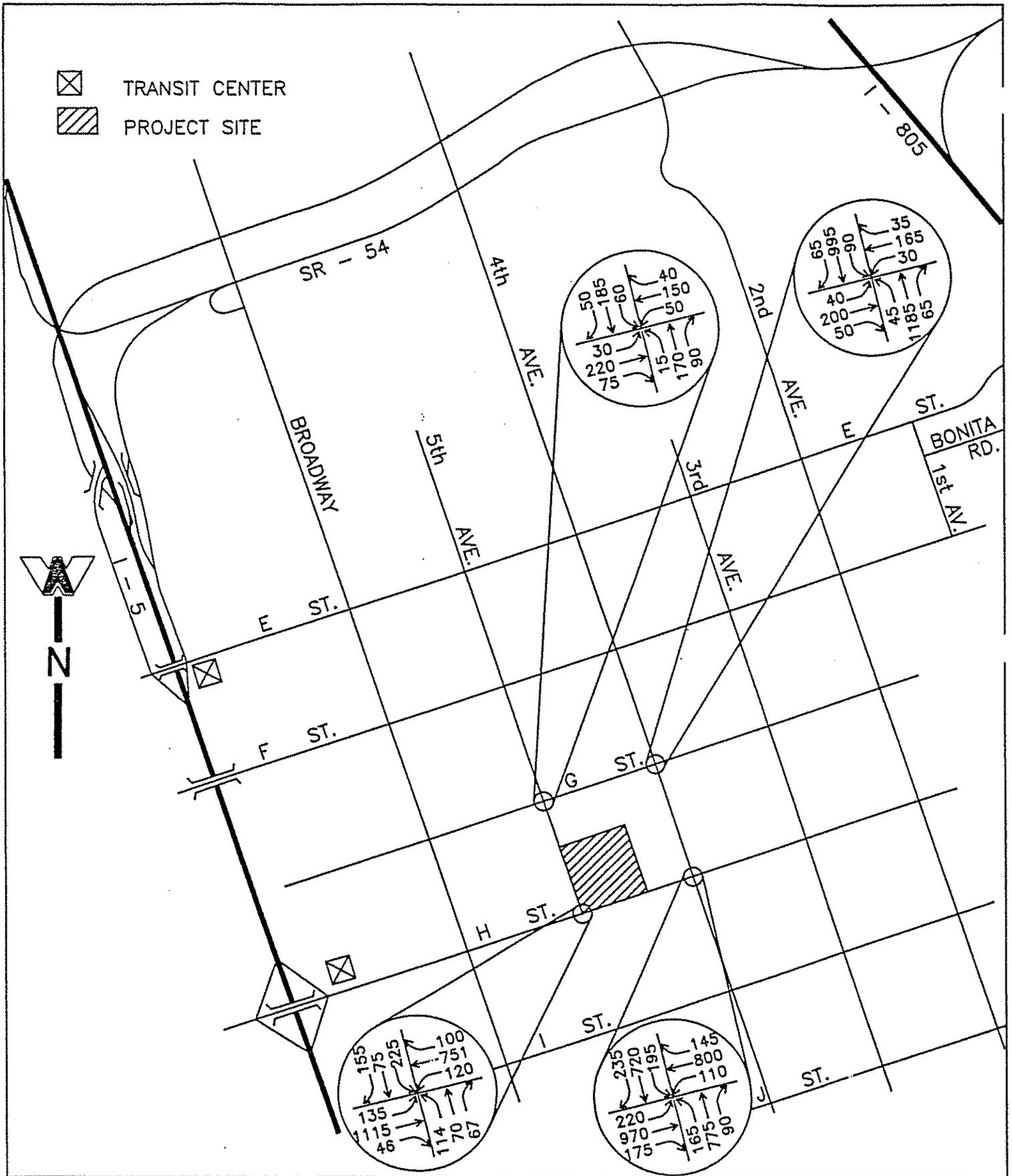
 **WILLDAN ASSOCIATES**
CONSULTING ENGINEERS AND PLANNERS
8343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122



YEAR 1995 W/ PHASE I AM PEAK HOUR
 TURNING MOVEMENTS

FIGURE 10

WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6363 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122



YEAR 1995 W/ PHASE I PM PEAK HOUR
 TURNING MOVEMENTS

FIGURE 11

Table 4

Intersection Level of Service
(1995 with Phase I)

Intersection	AM Peak		PM Peak	
	ICU	LOS	ICU	LOS
H Street/5th Avenue	0.44	A	0.70	B
H Street/4th Avenue	0.56	A	0.86	D
G Street/5th Avenue	0.42	A	0.50	A
G Street/4th Avenue	0.47	A	0.72	C

uses are comprised of a percentage of "passer by" trips and proposed project trips are mostly new trips added to the street network. Although the commercial trips comprise of a percentage of "passer by" trips, they do impact capacity along the street network due to turning movements at driveways. Figures 12 and 13 present the buildout travel forecast average daily trips on the street system surrounding the proposed project for general plan and proposed project conditions, respectively. Table 5 presents the daily traffic volumes on the street segment along with Circulation Element classifications recommended maximum LOS C daily traffic volumes and the percentage of the forecast buildout volumes (General Plan and proposed project) to the recommended volumes.

As shown on Table 5, most street segments in the project vicinity are projected to operate at LOS C or better under both general plan and proposed project conditions.

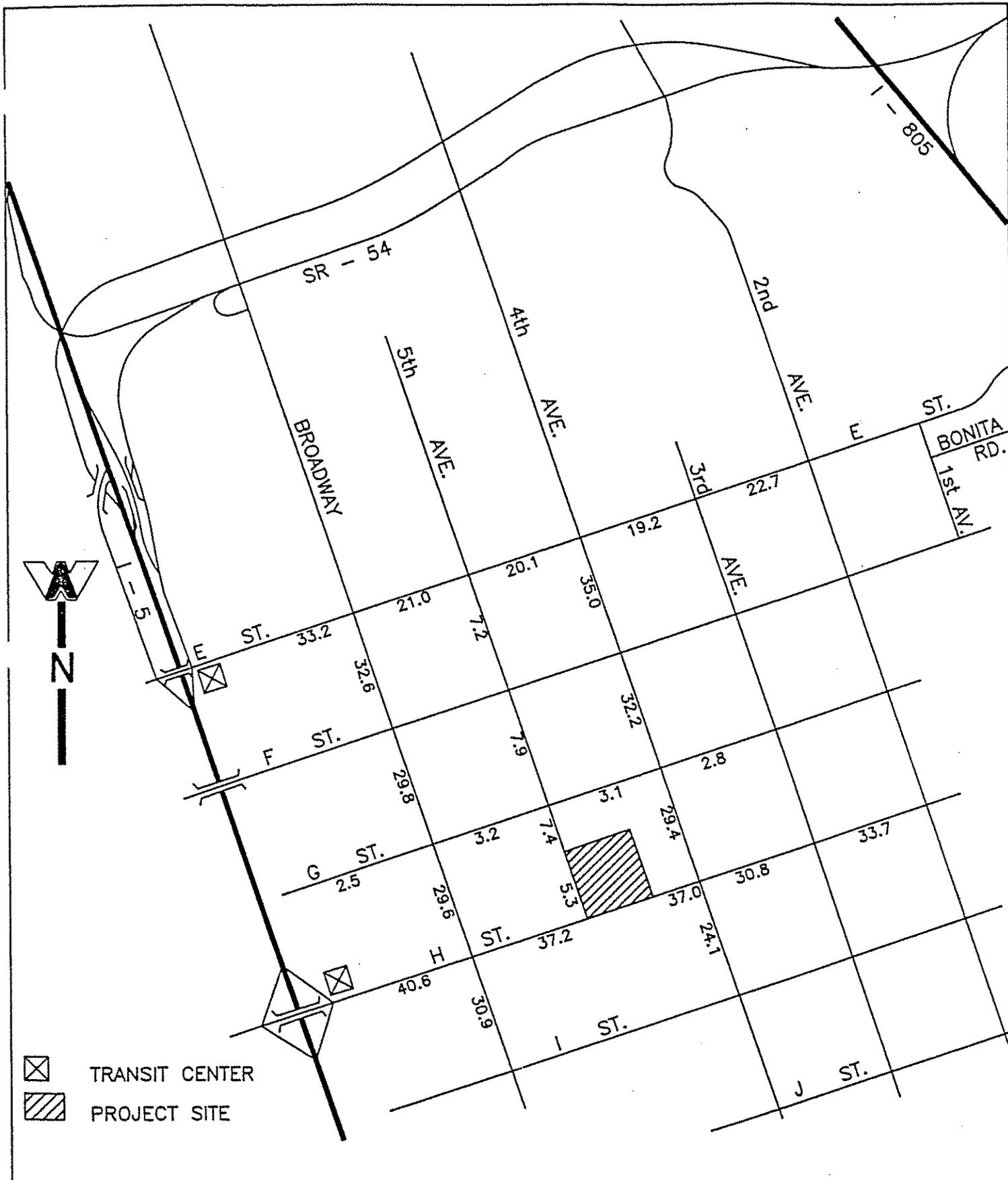
H Street between Interstate 5 and Broadway is projected to carry daily volumes in slightly in excess of 40,000 ADT under both general plan and proposed project conditions.

E Street between Interstate 5 and Broadway is projected to carry daily volumes in excess of 30,000 ADT under both general plan and proposed project conditions.

Broadway between E Street and F Street and between H Street and I Street is projected to carry volumes slightly in excess of 30,000 ADT under both general plan and proposed project conditions. Also, Broadway is projected to carry volumes that slightly exceed 30,000 ADT between F Street G Street under proposed project conditions.

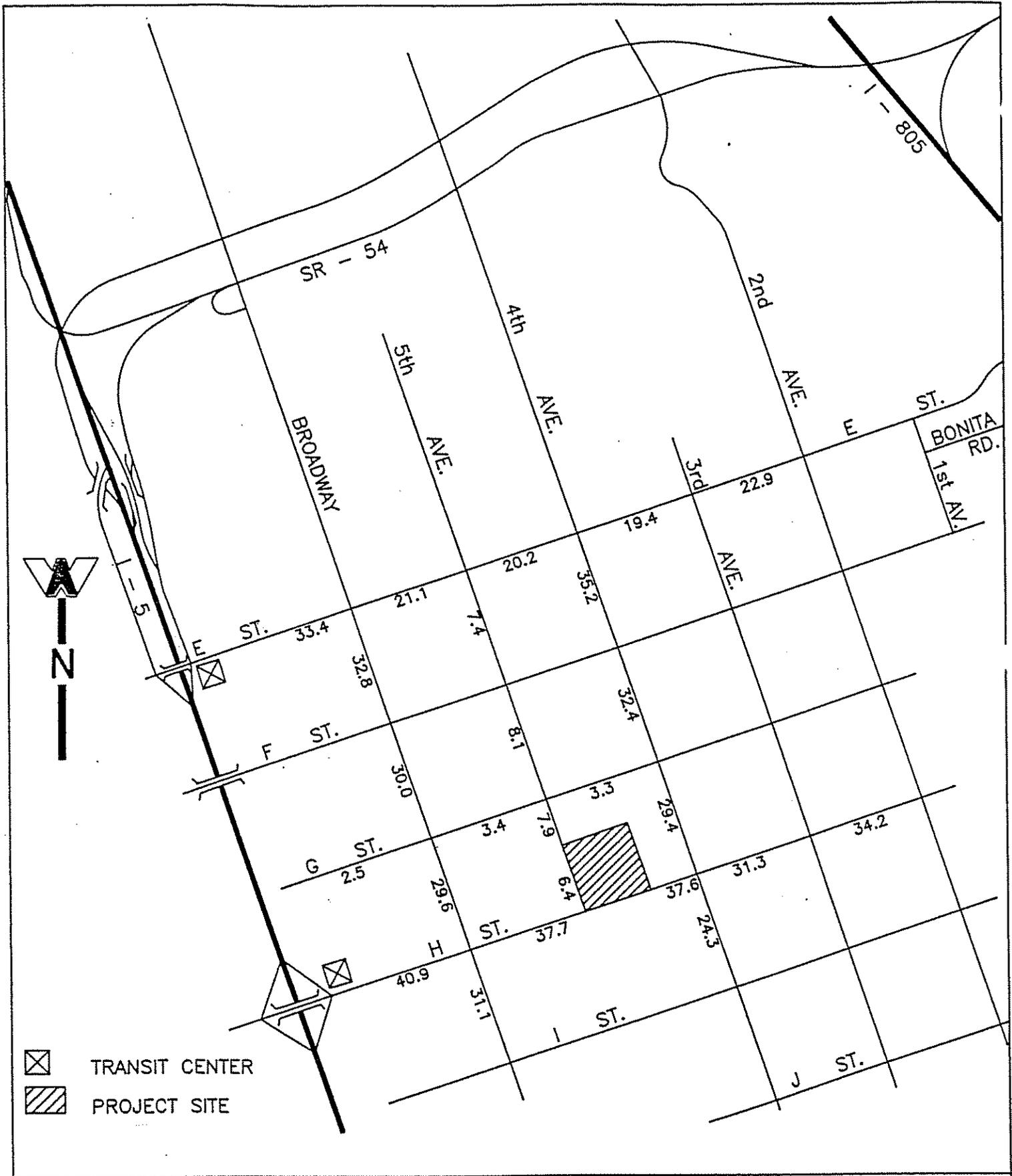
Fourth Avenue between E Street and I Street is projected to carry daily volume in excess of 22,000 ADT under both general plan and proposed project conditions.

It should be noted, "H" Street between Hilltop Drive and Third Avenue is designated as a four lane major street (City Council action July 11, 1980). The four lane designation will result in future poor levels of service at the following locations "H" Street/Hilltop Drive, "H" Street/First Avenue, "H" Street/Second Avenue, "H" Street/Third Avenue and "H" Street/Fourth Avenue, Table 6 was developed by City staff and provides a comparison of existing and future levels of service at the previously mentioned intersection with "H" Street assuming six lane capacities are achievable along "H" Street at these intersections.



BUILDOUT VOLUMES (GENERAL PLAN)

FIGURE 12



BUILDOUT VOLUMES (PROPOSED PROJECT)

FIGURE 13


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 CONSULTING ENGINEERS AND PLANNERS
 8343 GREYHORN DR., SUITE 250, SAN DIEGO, CA 92122

Table 5

**Buildout Street Segment
Operations in the Project Vicinity**

Street Segment	C.E. Classification	General Plan			Proposed Project		
		Daily Volumes	Rec. Max** Volumes	V/C	Daily Volumes	V/C	V/C
H Street							
Interstate 5 to Broadway	6M	40,600	40,000	1.02	40,900	1.02	1.02
Broadway to 5th Avenue	6M	37,200	40,000	0.93	37,700	0.93	0.94
5th Avenue to 4th Avenue	6M	37,000	40,000	0.93	37,600	0.93	0.94
4th Avenue to 3rd Avenue	6M	30,800	40,000	0.77	31,300	0.77	0.78
E/O 3rd Avenue	6M	33,700	40,000	0.84	34,200	0.84	0.86
G Street							
Broadway to 5th Avenue	2IIC	3,200	12,000	0.27	3,400	0.27	0.28
5th Avenue to 4th Avenue	2IIC	3,100	12,000	0.26	3,300	0.26	0.28
E Street							
Interstate 5 to Broadway	4M	33,200	30,000	1.11	33,400	1.11	1.11
Broadway to 5th Avenue	4IC	21,000	22,000	0.96	21,100	0.96	0.96
5th Avenue to 4th Avenue	4IC	20,100	22,000	0.91	20,200	0.91	0.92
4th Avenue to 3rd Avenue	4IC	19,200	22,000	0.41	19,400	0.41	0.88
5th Avenue							
E Street to F Street	2IIC	7,200	12,000	0.60	7,400	0.60	0.62
F Street to G Street	2IIC	7,900	12,000	0.66	8,100	0.66	0.68
G Street to H Street	2IIC	7,400	12,000	0.62	7,900	0.62	0.04

Table 5

Buildout Street Segment
Operations in the Project Vicinity

General Plan Proposed Project

Street Segment	C.E. Classification	Daily Volumes	Rec. Max** Volumes	V/C	Daily Volumes	V/C
Broadway						
E Street to F Street	4M	32,600	30,000	1.09	32,800	1.09
F Street to G Street	4M	29,800	30,000	0.99	30,000	1.00
G Street to H Street	4M	29,600	30,000	0.99	29,600	0.99
H Street to I Street	4M	30,900	30,000	1.03	31,100	1.04
4th Avenue						
E Street to F Street	4IC	35,000	22,000	1.59	35,200	1.60
F Street to G Street	4IC	32,200	22,000	1.46	32,400	1.47
G Street to H Street	4IC	29,400	22,000	1.34	29,400	1.34
H Street to I Street	4IC	24,100	22,000	1.10	24,300	1.10

Table 6 Comparison of Existing and Future Intersection Levels of Service (LOS) on "H" Street			
Intersection	Existing L.O.S.	Future LOS	
		Four-lane Major	Six-lane Major
H Street and Hilltop Drive	E	F	C*
H Street and First Avenue	C	E	C
H Street and Second Avenue	C	E	C
H Street and Third Avenue	D	F	D
H Street and Fourth Avenue	C	E	D

* Improvement with dual left turn lane on H Street.

Access, Parking and Internal Circulation

The Scripps Hospital Expansion project preliminary site plan indicates several access points to H Street, 5th Avenue and G Street (See Figure 3). This plan has been revised to address the traffic related issues identified by the City Traffic Engineer.

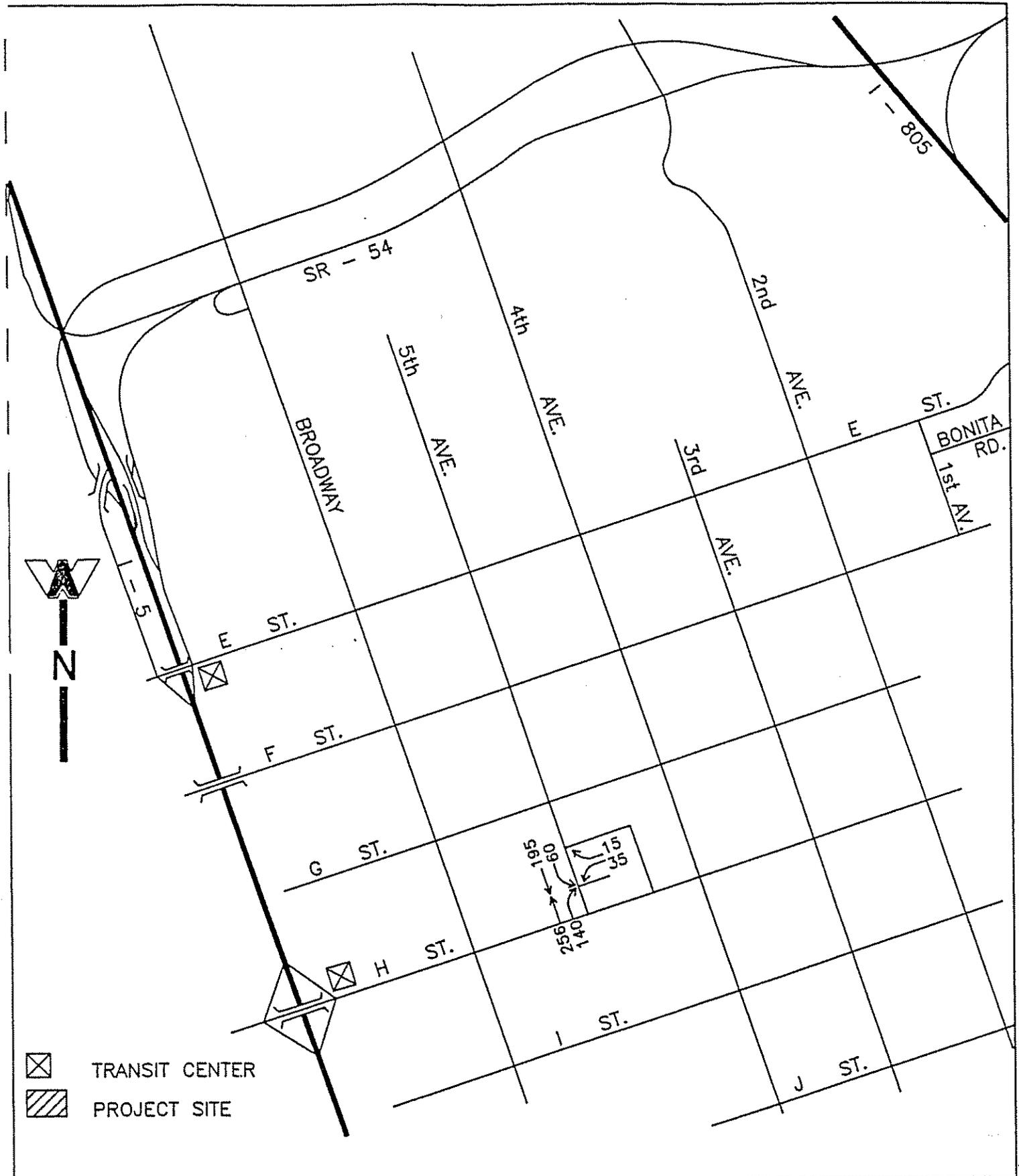
As shown on Figure 3, the primary west access would be provided from H Street via 5th Avenue. Driveway D would be patient/visitor access only to the parking structure and driveway E would be emergency room/service/staff access only to the parking structure and emergency room parking. As a worst case scenario, 70 percent of the project peak hour trips were assumed to take access from driveway D (based on the ratio of parking structure spaces to total project parking spaces). Figures 14 and 15 depict the turning movements at the 5th Avenue/west driveway under AM and PM peak hour conditions, respectively. The access was evaluated using the unsignalized intersection methodology described in *Transportation Research Board Special Report No. 209, 1985 Highway Capacity Manual*. This access is projected to operate at LOS A and D during the morning and evening peak hours, respectively, for the driveway approach left turning vehicles.

Driveway A is a right in-right out only along H Street serving the ER/service and existing medical office building.

Driveway B is an ingress only along H Street serving the hospital drop off area. Driveway C is a right in-right out only along H Street serving the medical office building drop off area and the parking structure. This driveway serves as the primary ingress to the parking structure from the east and west bound egress from the parking structure.

Driveway F is a north access from G Street serving the ER/staff and service parking. According to the hospital staff, the hospital experience 600 emergency vehicle trip ends per month. This average about 20 trip ends per day. G Street between Broadway and 4th Avenue is projected to operate at LOS C or better under existing plus project conditions (see Table 5). Additional access to the staff and service parking and emergency room would be provided from driveway A and E. Therefore, no significant traffic effect on G Street is projected with or without driveway F access.

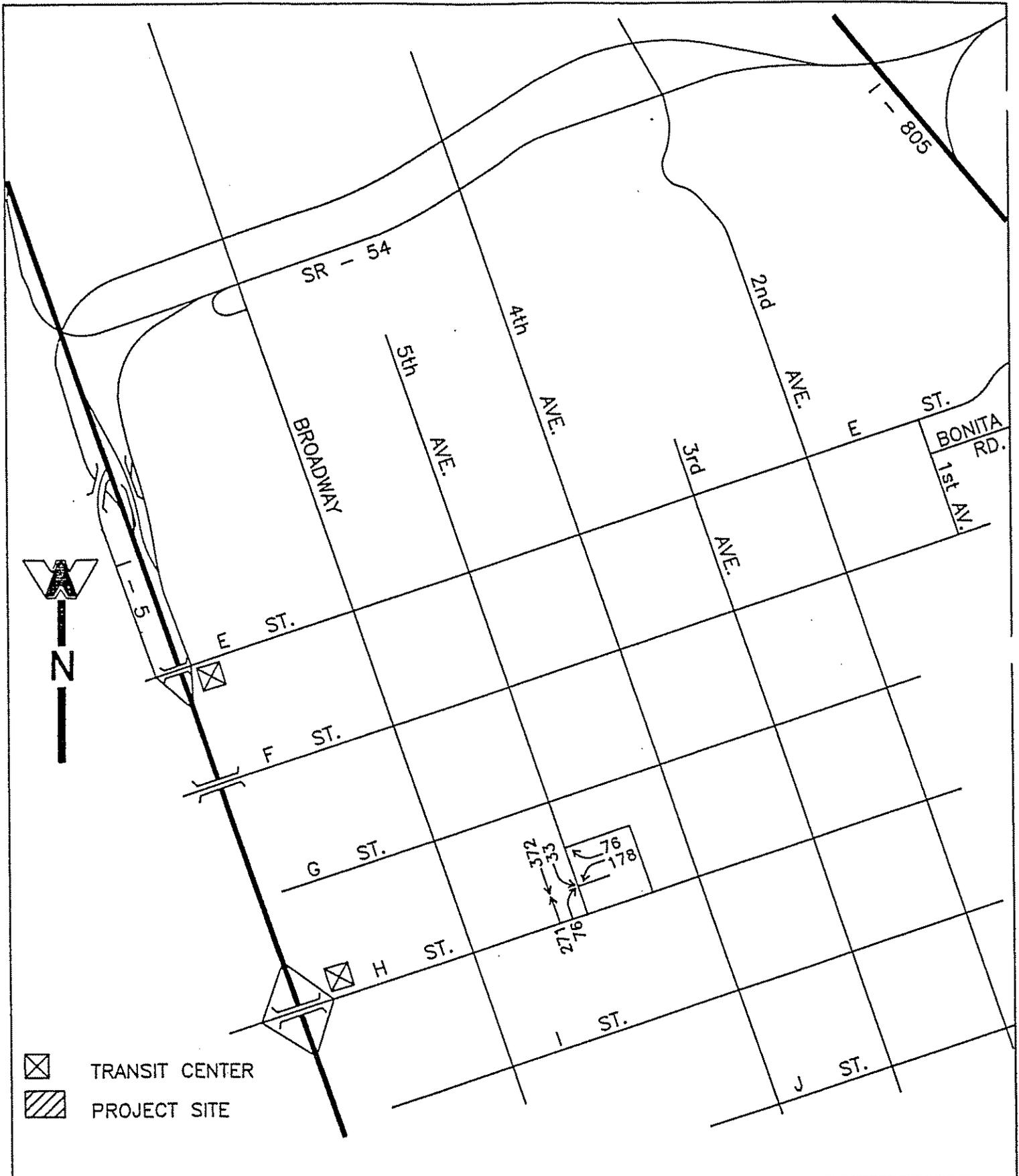
The project is proposing to construct a raised median along H Street. The left turn storage length for H Street westbound approach to southbound 5th Avenue is shown as 150 feet (see Figure 3). During the PM peak hour there will be in excess of 119 left turns from westbound H Street to southbound 5th Avenue. The maximum required storage would be 150 feet for a single left turn lane. Therefore, the storage length provided is sufficient.



EXISTING + PROJECT
 PARKING LOT ENTRANCE
 AM PEAK TURNING MOVEMENTS

FIGURE 14

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EXISTING + PROJECT
 PARKING LOT ENTRANCE
 PM PEAK TURNING MOVEMENTS

FIGURE 15



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 CONSULTING ENGINEERS AND PLANNERS
 6343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

Alternative Access to 4th Avenue

Access directly to 4th Avenue was discussed with the City Traffic Engineer. This would allow access to four different streets and tend to spread turning movements out more evenly to and from the project. This would entail a joint access agreement with the Medial office uses on the west side of 4th Avenue and the elimination of existing parking spaces.

This access alternative would most likely impact the "H" Street/4th Avenue signalized intersection since it would redistribute traffic north along 4th Avenue instead of west along "H" Street. An analysis fo the "H" Street/4th Avenue intersection was performed under 1995 plus Phase I conditions with a project access to 4th Avenue under AM and PM peak hour conditions.

Fifty percent of traffic from the south and east was assigned to this access and resulting peak hour traffic rerouted at the above mentioned intersection. The ICU analysis indicated a slight degradation from 0.56 to 0.57 during the AM peak hour and 0.86 to 0.88 during the PM peak hour. Since the level of service does not improve, the additional access at 4th Avenue may not prove to be advatagous from a cost-benefit standpoint.

CONCLUSIONS

- The proposed Scripps Hospital expansion is proposed to occur in two phases. The first phase is projected to generate a total of 4,980 daily vehicle trips (with 358 and 518 trips occurring during the AM and PM peak hours, respectively) and is expected to develop within the next five years.
- The existing land uses on the project site are estimated to generate approximately 7,800 daily vehicle trips today, however some are "passerby" trips due to the commercial attraction of these uses.
- Since the project's first phase is projected to develop within a five year time frame, the year 1995 with approved projects plus Rancho Del Rey SPA 3 travel forecasts prepared for the East Chula Vista Transportation Phasing Plan (ECVTPP) was used to evaluate short term cumulative conditions.
- Under existing conditions, most street segments in the vicinity of the project operate at or below the City of Chula Vista's maximum LOS C recommended daily capacities for their respective classifications. The exceptions are "E" Street between I-5 and Broadway, Broadway between "F" Street and "G" Street, 4th Avenue between "G" Street and "H" Street and "H" Street east of 3rd Avenue.
- All signalized intersections adjacent to the proposed project currently operate at LOS C or better under AM and PM peak hour conditions and are in conformance with the City's threshold standards.
- Most signalized intersections adjacent to the project are projected to operate at LOS C or better under AM and PM peak hour conditions in year 1995. The exception is "H" Street/4th Avenue which is projected to operate at LOS D during the PM peak hour, however, the intersection will continue to be in conformance with the City's threshold standards.
- Under buildout of the City of Chula Vista General Plan, the Scripps Hospital ultimate expansion will generate 9,015 daily vehicle trips which is 1,500 daily trips over what was assumed in the Scenario #4 buildout travel forecasts prepared by SANDAG in 1989.
- Construction of a raised median along "H" Street will provide greater management of traffic accessing properties on the north and south sides of "H" Street.
- Widening of the northern side of "H" Street just west of 4th Avenue prior to occupancy of the phase two medical office buildings will correct existing deficient roadway and sidewalk conditions.

- Alternative access to 4th Avenue was tested and found to slightly reduce the intersection capacity at the "H" Street/4th Avenue signalized intersection under AM and PM peak hour conditions. Therefore, it does not appear access to 4th Avenue will provide an overall benefit to the surrounding system.
- H Street between I-805 and I-5 is designated in the General Plan Circulation Element as a six lane major street except between Hilltop Drive and Third Avenue where H Street is designated as a four lane major street. The four lane designation of H Street between Hilltop Drive and Third Avenue in the General Plan Circulation Element, does not provide sufficient capacity to accommodate projected traffic volumes. The cumulative effect of project traffic and other traffic in the future will result in an adverse impact on this four lane section of H Street.
- As a result of cumulative development (including the proposed Scripps Hospital Expansion), significant adverse unmitigatable impacts may occur at the "H" Street/Fourth Avenue intersection prior to ultimate widening of H Street to six lanes.

MITIGATION MEASURES

To mitigate the Scripps Hospital expansion project traffic impacts to a level of less than significant, the following actions are recommended:

Phase I - Mitigation

1. Dedicate ultimate right-of-way along 5th Avenue along the project frontage and construct a northbound access lane.
2. Dedicate ultimate right-of-way along "H" Street along the project frontage and construct an additional westbound lane.
3. Construct raised median along "H" Street between existing improvements at Fourth Avenue and Fifth Avenue as shown on Figure 3.
4. Pay traffic signal impact fees to the City of Chula Vista in accordance with City policy for upgrading of traffic signals within the western portion of Chula Vista resulting from increasing traffic volumes.

Phase II - Ultimate Mitigation

1. Prior to phase two (ultimate) expansion of the medical office building which generates 3,200 ADT dedicate sufficient room and widen the north side of "H" Street between Fourth Avenue and the project to provide a continuous third westbound lane between Fourth Avenue and Fifth Avenue.

APPENDIX

Table A-1

Descriptions of Conditions for Various Levels of Service

<u>Level of Service</u>	<u>Operating Conditions</u>
A	Free flow; speed controlled by driver's desires, speed limits, or physical roadway conditions.
B	Stable flows; operating speeds beginning to be restricted; little or no restrictions on maneuverability from other vehicles.
C	Stable flow; speeds and maneuverability more closely restricted.
D	Approaches unstable flow; tolerable speeds can be maintained, but temporary restrictions to flow cause substantial drops in speed. Little freedom to maneuver, comfort and convenience low.
E	Volumes near capacity; flow unstable; stoppages of momentary duration. Ability to maneuver severely limited.
F	Forced flow; low operating speeds; volumes below capacity, queues form.

Table A-2

Level of Service Ranges

Maximum Sum of Critical Volumes in VPH

<u>Level of Service</u>	<u>Typical V/C Ratio</u>
A	0.00 - 0.60
B	0.61 - 0.70
C	0.71 - 0.80
D	0.81 - 0.90
E	0.91 - 1.00
	varies

Table A-3

Level of Service and Expected Delay
For Reserve Capacity Ranges

Unsignalized Intersections

<u>Reserve Capacity</u>	<u>Level of Service</u>	<u>Expected Traffic Delay</u>
400 or More	A	Little or No Delay
300 to 399	B	Short Traffic Delays
200 to 299	C	Average Traffic Delays
100 to 199	D	Long Traffic Delays
0 to 99	E	Very Long Traffic Delays
Less than 0	E	Failure - Extreme Congestion
(Any Value)	F	Intersection Blocked by External Causes

MOVE	EXISTING CONDITIONS VOLUME	CAP	(1989) V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE 1 TOTAL VOLUME	CAP	V/C RATIO														
NB LT	107	1500	0.07	27	134	1500	0.09														
NB THRU	366	3400	0.12 *	86	452	3400	0.15 *														
NB RT	38	0		10	48	0															
SB LT	91	1500	0.06 *	9	100	1500	0.07 *														
SB THRU	334	3400	0.10	18	352	3400	0.10														
SB RT	85	1500	0.06	8	93	1500	0.06														
EB LT	106	3000	0.04 *	3	109	3000	0.04 *														
EB THRU	390	3400	0.13	13	403	3400	0.14														
EB RT	68	0		3	71	0															
WB LT	49	3000	0.02	4	53	3000	0.02														
WB THRU	518	3400	0.18 *	64	582	3400	0.21 *														
WB RT	108	0		10	118	0															
CLEARANCE			0.1				0.1														
ICU			0.50				0.56														
LEVEL OF SERVICE			A				A														
<p>LEVEL OF SERVICE RANGES</p> <p>MAXIMUM SUM OF CRITICAL VOLUMES IN VPH</p> <table> <thead> <tr> <th>LEVEL OF SERVICE</th> <th>TYPICAL V/C RATIO</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>0.00-0.60</td> </tr> <tr> <td>B</td> <td>0.61-0.70</td> </tr> <tr> <td>C</td> <td>0.71-0.80</td> </tr> <tr> <td>D</td> <td>0.81-0.90</td> </tr> <tr> <td>E</td> <td>0.91-1.00</td> </tr> <tr> <td>F</td> <td>>1.0</td> </tr> </tbody> </table> <p>* CRITICAL MOVE</p>								LEVEL OF SERVICE	TYPICAL V/C RATIO	A	0.00-0.60	B	0.61-0.70	C	0.71-0.80	D	0.81-0.90	E	0.91-1.00	F	>1.0
LEVEL OF SERVICE	TYPICAL V/C RATIO																				
A	0.00-0.60																				
B	0.61-0.70																				
C	0.71-0.80																				
D	0.81-0.90																				
E	0.91-1.00																				
F	>1.0																				
4TH AVE AT "H" ST.-AM PEAK				FIGURE A1 WILLDAN ASSOCIATES																	

MOVE	EXISTING CONDITIONS (1989)			1995 CONDITIONS W/PHASE 1			
	VOLUME	CAP	V/C RATIO	ADDED VOLUME	TOTAL VOLUME	CAP	V/C RATIO
NB LT	132	1500	0.09	33	165	1500	0.11
NB THRU	627	3400	0.21 *	148	775	3400	0.25 *
NB RT	71	0		19	90	0	
SB LT	178	1500	0.12 *	17	195	1500	0.13 *
SB THRU	684	3400	0.20	36	720	3400	0.21
SB RT	215	1500	0.14	20	235	1500	0.16
EB LT	214	3000	0.07	6	220	2700	0.08
EB THRU	939	3400	0.33 *	31	970	3400	0.34 *
EB RT	167	0		8	175	0	
WB LT	102	3000	0.03 *	8	110	2700	0.04 *
WB THRU	712	3400	0.25	88	800	3400	0.28
WB RT	133	0		12	145	0	
CLEARANCE			0.1				0.1
ICU			0.78				0.86
LEVEL OF SERVICE			C				D
LEVEL OF SERVICE RANGES MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE	TYPICAL V/C RATIO						
A	0.00-0.60						
B	0.61-0.70						
C	0.71-0.80						
D	0.81-0.90						
E	0.91-1.00						
F	>1.0						
* CRITICAL MOVE							
4TH AVE AT "H" ST.-PM PEAK					FIGURE A2 WILLDAN ASSOCIATES		

MOVE	EXISTING CONDITIONS (1989)			1995 CONDITIONS W/PHASE 1			
	VOLUME	CAP	V/C RATIO	ADDED VOLUME	TOTAL VOLUME	CAP	V/C RATIO
NB LT	4	1500	0.00	0	4	1500	0.00
NB THRU	25	1700	0.01	*0	25	1700	0.01 *
NB RT	2	1500	0.00	0	2	1500	0.00
SB LT	85	1500	0.06	*	23	108	1500 0.07 *
SB THRU	27	1700	0.02	0	27	1700	0.02
SB RT	83	1500	0.06		23	106	1500 0.07
EB LT	109	1500	0.07	*	31	140	1500 0.09 *
EB THRU	383	3400	0.11		101	484	3400 0.14
EB RT	10	1500	0.01	0	10	1500	0.01
WB LT	14	1500	0.01	0	14	1500	0.01
WB THRU	557	3400	0.20	*0	557	3400	0.16 *
WB RT	122	0			5	127	1500 0.08
CLEARANCE			0.1			0.1	
ICU			0.44			0.44	
LEVEL OF SERVICE			A			A	
LEVEL OF SERVICE RANGES MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE				TYPICAL V/C RATIO			
A				0.00-0.60			
B				0.61-0.70			
C				0.71-0.80			
D				0.81-0.90			
E				0.91-1.00			
F				>1.0			
* CRITICAL MOVE							
5TH AVE. AT H ST. AM PEAK					FIGURE A3 WILLDAN ASSOCIATES		

MOVE	EXISTING CONDITIONS			1995 CONDITIONS		W/PHASE 1		
	VOLUME	CAP	(1989) V/C RATIO	ADDED VOLUME		TOTAL VOLUME	CAP	V/C RATIO
NB LT	114	1500	0.08	0		114	1500	0.08
NB THRU	70	1700	0.04	0		70	1700	0.04
NB RT	67	1500	0.04	*0		67	1500	0.04 *
SB LT	177	1500	0.12	*	48	225	1500	0.15 *
SB THRU	74	1700	0.04		1	75	1700	0.04
SB RT	121	1500	0.08		34	155	1500	0.10
EB LT	105	1500	0.07		30	135	1500	0.09
EB THRU	883	3400	0.26	*	232	1115	3400	0.33 *
EB RT	46	1500	0.03	0		46	1500	0.03
WB LT	119	1500	0.08	*	1	120	1500	0.08 *
WB THRU	751	3400	0.25	0		751	3400	0.25
WB RT	96	0			4	100	0	
CLEARANCE			0.1					0.1
ICU			0.60					0.70
LEVEL OF SERVICE			A					B
LEVEL OF SERVICE RANGES								
MAXIMUM SUM OF CRITICAL VOLUMES IN VPH								
LEVEL OF SERVICE			TYPICAL V/C RATIO					
A			0.00-0.60					
B			0.61-0.70					
C			0.71-0.80					
D			0.81-0.90					
E			0.91-1.00					
F			>1.0					
* CRITICAL MOVE								
5TH AVE. AT H ST. PM PEAK						FIGURE A4 WILLDAN ASSOCIATES		

MOVE	EXISTING CONDITIONS		(1989)	1995 CONDITIONS		W/PHASE	1	
	VOLUME	CAP	V/C RATIO	ADDED VOLUME	TOTAL VOLUME	CAP	V/C RATIO	
NB LT	58	1500	0.04 *	19	77	1500	0.05 *	
NB THRU	389	3400	0.13	100	489	3400	0.16	
NB RT	38	0		5	43	0		
SB LT	11	1500	0.01	3	14	1500	0.01	
SB THRU	385	3400	0.13 *	100	485	3400	0.16 *	
SB RT	41	0		11	52	0		
EB LT	42	0		0	42	0		
EB THRU	114	1500	0.16 *	2	116	1500	0.17 *	
EB RT	90	0		0	90	0		
WB LT	41	0		0	41	0		
WB THRU	157	1500	0.15	0	157	1500	0.15	
WB RT	25	0		4	29	0		
CLEARANCE			0.1					0.1
ICU			0.43					0.47
LEVEL OF SERVICE			A					A
LEVEL OF SERVICE RANGES								
MAXIMUM SUM OF CRITICAL VOLUMES IN VPH								
LEVEL OF SERVICE	TYPICAL V/C RATIO							
A	0.00-0.60							
B	0.61-0.70							
C	0.71-0.80							
D	0.81-0.90							
E	0.91-1.00							
F	>1.0							
* CRITICAL MOVE								
4TH AVE.	AT G	ST.-	AM	PEAK	FIGURE	A5	WILLDAN ASSOCIATES	

MOVE	EXISTING CONDITIONS VOLUME	CAP	(1989) V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE 1 TOTAL VOLUME	CAP	V/C RATIO
NB LT	34	1500	0.02	11	45	1500	0.03
NB THRU	942	3400	0.29 *	243	1185	3400	0.37 *
NB RT	58	0		7	65	0	
SB LT	72	1500	0.05 *	18	90	1500	0.06 *
SB THRU	790	3400	0.25	205	995	3400	0.31
SB RT	51	0		14	65	0	
EB LT	52	0		0	52	0	
EB THRU	197	1500	0.19 *	3	200	1500	0.19 *
EB RT	40	0		0	40	0	
WB LT	34	0		0	34	0	
WB THRU	165	1500	0.15	0	165	1500	0.16
WB RT	30	0		5	35	0	
CLEARANCE			0.1				0.1
ICU			0.63				0.72
LEVEL OF SERVICE			B				C
LEVEL OF SERVICE RANGES							
MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE	TYPICAL V/C RATIO						
A	0.00-0.60						
B	0.61-0.70						
C	0.71-0.80						
D	0.81-0.90						
E	0.91-1.00						
F	>1.0						
* CRITICAL MOVE							
4TH AVE.	AT G	ST.-	PM	PEAK	FIGURE A6		
					WILLDAN ASSOCIATES		

MOVE	EXISTING CONDITIONS VOLUME	CAP	(1989) V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE 1 TOTAL VOLUME	CAP	V/C RATIO
NB LT	58	0		4	62	0	
NB THRU	71	1500	0.14 *	2	73	1500	0.14 *
NB RT	76	0		4	80	0	
SB LT	20	0		2	22	0	
SB THRU	87	1500	0.09	1	88	1500	0.10
SB RT	33	0		1	34	0	
EB LT	43	0		2	45	0	
EB THRU	143	1500	0.16	2	145	1500	0.17
EB RT	61	0		0	61	0	
WB LT	46	0		0	46	0	
WB THRU	187	1500	0.18 *	0	187	1500	0.18 *
WB RT	35	0		0	35	0	
CLEARANCE			0.1				0.1
ICU			0.42				0.42
LEVEL OF SERVICE			A				A
LEVEL OF SERVICE RANGES MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE				TYPICAL V/C RATIO			
A				0.00-0.60			
B				0.61-0.70			
C				0.71-0.80			
D				0.81-0.90			
E				0.91-1.00			
F				>1.0			
* CRITICAL MOVE							
5TH AVE	AT G	ST.-	AM	PEAK	FIGURE	A7	WILLDAN ASSOCIATES

MOVE	EXISTING CONDITIONS VOLUME	CAP	(1989) V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE 1 TOTAL VOLUME	CAP	V/C RATIO
NB LT	14	0		1	15	0	
NB THRU	166	1500	0.18	4	170	1500	0.18 *
NB RT	86	0		4	90	0	
SB LT	54	0		6	60	0	
SB THRU	183	1500	0.19 *	2	185	1500	0.20
SB RT	49	0		1	50	0	
EB LT	29	0		1	30	0	
EB THRU	218	1500	0.18 *	2	220	1500	0.22 *
EB RT	25	0		50	75	0	
WB LT	52	0		-2	50	0	
WB THRU	149	1500	0.16	1	150	1500	0.16
WB RT	40	0		0	40	0	
CLEARANCE			0.1				0.1
ICU			0.47				0.50
LEVEL OF SERVICE			A				A
LEVEL OF SERVICE RANGES MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE				TYPICAL V/C RATIO			
A				0.00-0.60			
B				0.61-0.70			
C				0.71-0.80			
D				0.81-0.90			
E				0.91-1.00			
F				>1.0			
* CRITICAL MOVE							
5TH AVE. AT G ST.- PM PEAK				FIGURE A8 WILLDAN ASSOCIATES			

MOVE	EXISTING CONDITIONS (1989)		V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE S W/ACCESS TO TOTAL VOLUME	1 TO 4TH CAP	V/C RATIO														
NB LT	107	1500	0.07	13	120	1500	0.08														
NB THRU	366	3400	0.12 *	100	466	3400	0.15 *														
NB RT	38	0		10	48	0															
SB LT	91	1500	0.06 *	20	111	1500	0.07 *														
SB THRU	334	3400	0.10	22	356	3400	0.10														
SB RT	85	1500	0.06	8	93	1500	0.06														
EB LT	106	3000	0.04 *	3	109	3000	0.04 *														
EB THRU	390	3400	0.13	2	392	3400	0.14														
EB RT	68	0		-1	67	0															
WB LT	49	3000	0.02	4	53	3000	0.02														
WB THRU	518	3400	0.18 *	21	539	3400	0.21 *														
WB RT	108	0		53	161	0															
CLEARANCE			0.1				0.1														
ICU			0.50				0.57														
LEVEL OF SERVICE			A				A														
<p>LEVEL OF SERVICE RANGES</p> <p>MAXIMUM SUM OF CRITICAL VOLUMES IN VPH</p> <table> <thead> <tr> <th>LEVEL OF SERVICE</th> <th>TYPICAL V/C RATIO</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>0.00-0.60</td> </tr> <tr> <td>B</td> <td>0.61-0.70</td> </tr> <tr> <td>C</td> <td>0.71-0.80</td> </tr> <tr> <td>D</td> <td>0.81-0.90</td> </tr> <tr> <td>E</td> <td>0.91-1.00</td> </tr> <tr> <td>F</td> <td>>1.0</td> </tr> </tbody> </table> <p>* CRITICAL MOVE</p>								LEVEL OF SERVICE	TYPICAL V/C RATIO	A	0.00-0.60	B	0.61-0.70	C	0.71-0.80	D	0.81-0.90	E	0.91-1.00	F	>1.0
LEVEL OF SERVICE	TYPICAL V/C RATIO																				
A	0.00-0.60																				
B	0.61-0.70																				
C	0.71-0.80																				
D	0.81-0.90																				
E	0.91-1.00																				
F	>1.0																				
4TH AVE AT "H" ST.-AM PEAK				FIGURE A9 WILLDAN ASSOCIATES																	

MOVE	EXISTING CONDITIONS VOLUME	CAP	(1989) V/C RATIO	1995 CONDITIONS ADDED VOLUME	W/PHASE S W/ACCESS TOTAL VOLUME	1 TO 4TH AVE CAP	V/C RATIO
NB LT	132	1500	0.09	25	157	1500	0.10
NB THRU	627	3400	0.21 *	156	783	3400	0.26 *
NB RT	71	0		19	90	0	
SB LT	178	1500	0.12 *	71	249	1500	0.17 *
SB THRU	684	3400	0.20	54	738	3400	0.22
SB RT	215	1500	0.14	20	235	1500	0.16
EB LT	214	3000	0.07	6	220	2700	0.08
EB THRU	939	3400	0.33 *	-23	916	3400	0.32 *
EB RT	167	0		-10	157	0	
WB LT	102	3000	0.03 *	8	110	2700	0.04 *
WB THRU	712	3400	0.25	65	777	3400	0.28
WB RT	133	0		35	168	0	
CLEARANCE			0.1				0.1
ICU			0.78				0.88
LEVEL OF SERVICE			C				D
LEVEL OF SERVICE RANGES							
MAXIMUM SUM OF CRITICAL VOLUMES IN VPH							
LEVEL OF SERVICE				TYPICAL V/C RATIO			
A				0.00-0.60			
B				0.61-0.70			
C				0.71-0.80			
D				0.81-0.90			
E				0.91-1.00			
F				>1.0			
* CRITICAL MOVE							
4TH AVE AT "H" ST.-PM PEAK				FIGURE A10 WILLDAN ASSOCIATES			

LOCATION: 5TH AVENUE/WEST DRIVEWAY NAME:1995 WITH PHASE 1 EXPANSI

HOURLY VOLUMES

VOLUMES IN PCPH

Major street:5TH AVE

N= 2 <---V5--- 195 <---V5---
 Grade 256---V2---> v---V4--- 60 ---V2---> v---V4--- 66
 OX 140---V3---v H= 2 ---V3---v

Date of Counts: | | | | | | | | | |
 NONE | V7 | V9 | X STOP | V7 | V9 |
 Time Period: | | | | | | | | | |
 AM PEAK HOUR | 35 | 15 | YIELD | 39 | 17 |

Approach Speed: Minor Street: Grade
 30 MPH WEST DRIVEWAY OX
 PHF: .90 H= 2
 Population: 100000

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	256	140	60	195	35	15
Vol(PCPH), see Table 10.1	XXXXXXX	XXXXXXX	66	XXXXXXX	39	17

STRP 1 : RT From Minor Street | /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 0 + 256 = 256 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 831 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 831 pcph

STRP 2 : LT From Major Street | v-- V4

Conflicting Flows, Vc | V3+V2= 0 + 256 = 256 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 927 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 7.1% P4= .96
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 927 pcph

STRP 3 : LT From Minor Street | <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 | 0 + 256 + 195 + 60 = 511 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 482 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 482 x .96 = 463 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	39	463		424		A	
9	17	831		814		A	
4	66	927		861		A	

LOCATION: 5TH AVENUE/WEST DRIVEWAY ;NAME:1995 WITH PHASE 1 EXPANSI

HOURLY VOLUMES

N>

Major street:5TH AVE

N= 2	<---V5---	372		<---V5---	
Grade 271---V2---	v---V4---	33		---V2---	v---V4--- 36
OX 76---V3---v		N= 2		---V3---v	

	<	>		<	>	
Date of Counts:						
NONE	V7	V9	X STOP	V7	V9	
Time Period:			YIELD			
PM PEAK HOUR	178	76		196	84	
Approach Speed: 30 MPH	Minor Street:	Grade				
PHF: .90	WEST DRIVEWAY	OX				
Population: 100000		N= 2				

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	271	76	33	372	178	76
Vol(pcp), see Table 10.1	XXXXXXX	XXXXXXX	36	XXXXXXX	196	84

STEP 1 : RT From Minor Street | /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 0 + 271 = 271 vph(Vc9)

Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)

Potential Capacity, Cp | Cp9= 815 pcp (Fig.10.3)

Actual Capacity, Ca | Ca9=Cp9= 815 pcp

STEP 2 : LT From Major Street | v-- V4

Conflicting Flows, Vc | V3+V2= 0 + 271 = 271 vph(Vc4)

Critical Gap, Tc | Tc= 5 secs (Tab.10.2)

Potential Capacity, Cp | Cp4= 913 pcp (Fig.10.3)

% of Cp utilized and Impedance Factor | (V4/Cp4)x100= 3.9% P4= .98

Actual Capacity, Ca (Fig.10.5) | Ca4=Cp4= 913 pcp

STEP 3 : LT From Minor Street | <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=

| 0 + 271 + 372 + 33 = 676 vph(Vc7)

Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)

Potential Capacity, Cp | Cp7= 378 pcp (Fig.10.3)

Actual Capacity, Ca | Ca7=Cp7xP4= 378 x .98 = 370 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	196	370		174		D	
9	84	815		731		A	
4	36	913		877		A	



July 18, 1991

Ms. Kelli Rasmus
DUDEK AND ASSOCIATES, INC.
605 Third Street
Encinitas, CA 92024

Dear Kelli:

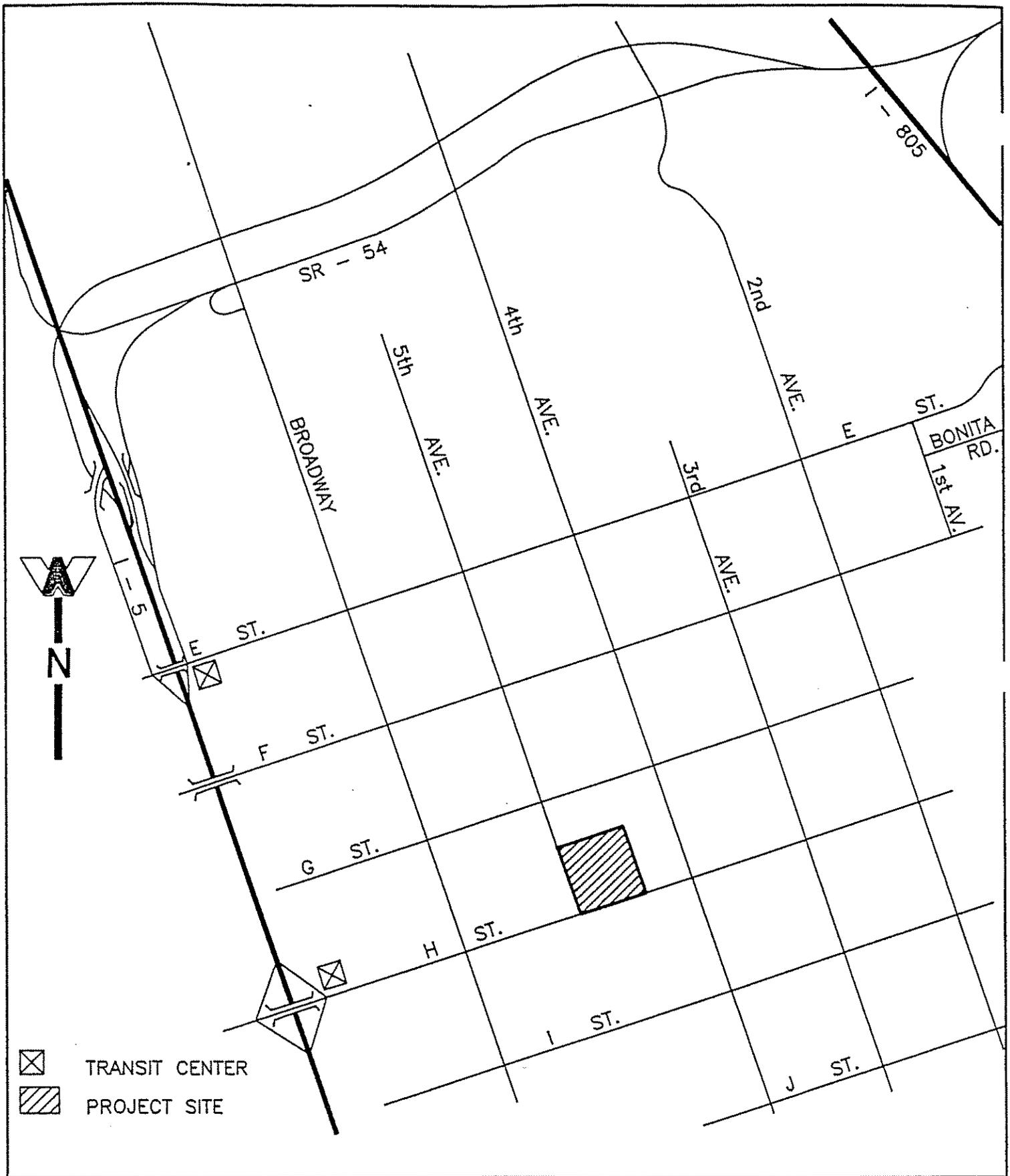
Willdan Associates is pleased to submit this supplemental analysis for the Scripps Memorial Hospital Expansion Environmental Impact Report (EIR). This report will serve as an addendum to the original Scripps Memorial Hospital Expansion Draft Environmental Impact Report dated March, 1991. Specifically, this report will focus in on the impacts associated with two submitted project alternatives. These alternatives include a site plan submitted by the "H Street Business Coalition" as well as an "all commercial" alternative submitted by Mr. Wayne Wennke. This report will be broken down into three sections:

- ◆ Background and Introduction
- ◆ Analysis
- ◆ Summary and Conclusions

BACKGROUND AND INTRODUCTION

In March, 1991, the City of Chula Vista distributed for public review a draft Environmental Impact Report for the Scripps Memorial Hospital Expansion project. Figure 1 depicts the project location within the central portion of the City of Chula Vista. The 8.9 acre parcel is located within the City of Chula Vista amended Towncenter Two Redevelopment Plan and currently is developed with commercial uses. While the above mentioned draft EIR was circulating for public comment, the City of Chula Vista received two alternative development proposals for the project site. The site plans for these two development proposals are included as Figures 2 and 3 in this report.

Regional access to the project is provided from Interstate 5 and 805 via H Street. Figure 4 illustrates the most recent traffic count information available for the project vicinity streets. This data was provided by the City of Chula Vista. Since the existing conditions in the previously mentioned EIR are still valid, they will not be reiterated in this letter. For reference, Figures 5 and 6 depict the existing AM and PM peak hour turning movements at key intersections in the project vicinity, respectively. Figure 7 illustrates the existing lane configurations at the project vicinity intersections.



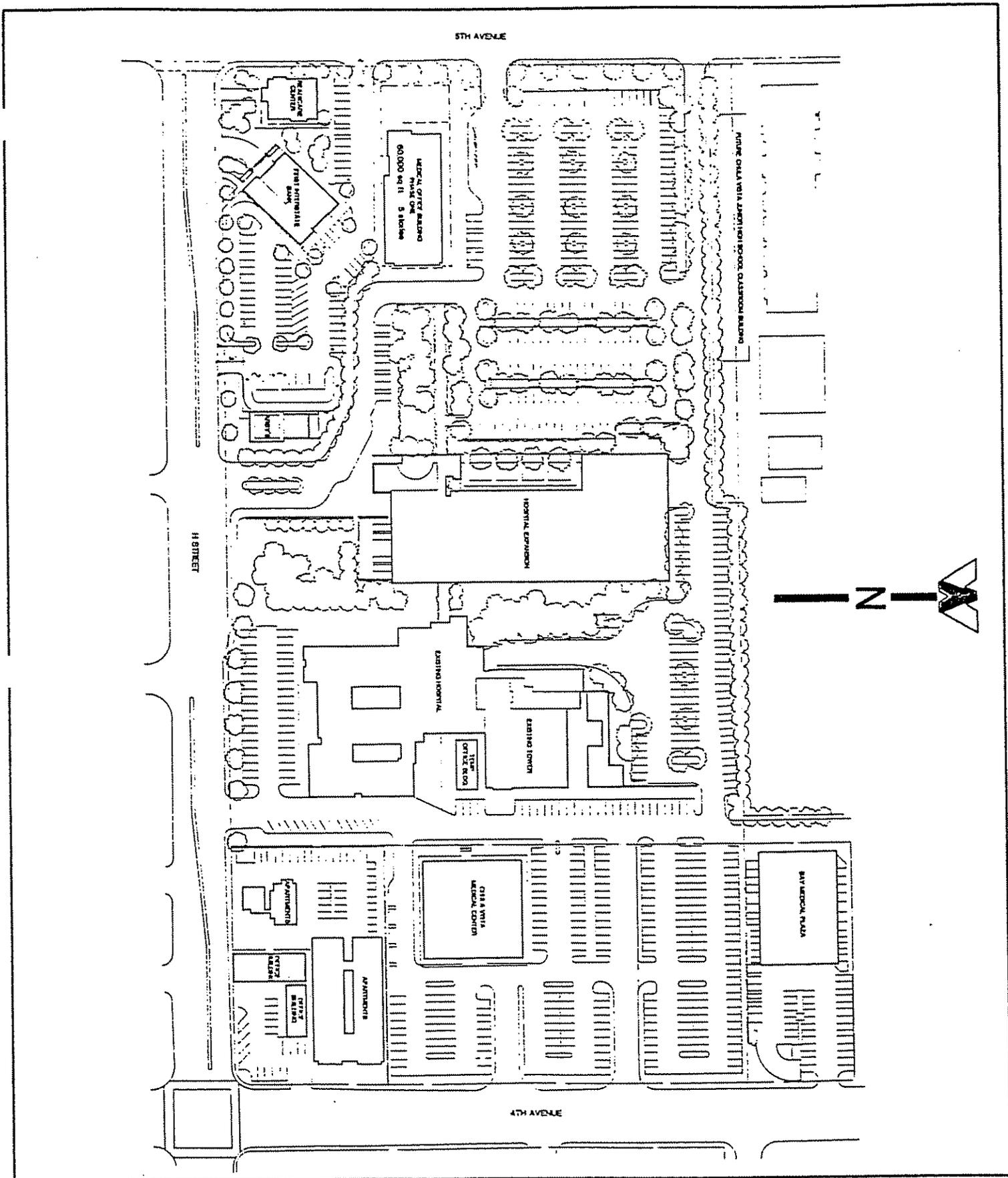
- ☒ TRANSIT CENTER
- ▨ PROJECT SITE

PROJECT VICINITY

FIGURE 1



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 8343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

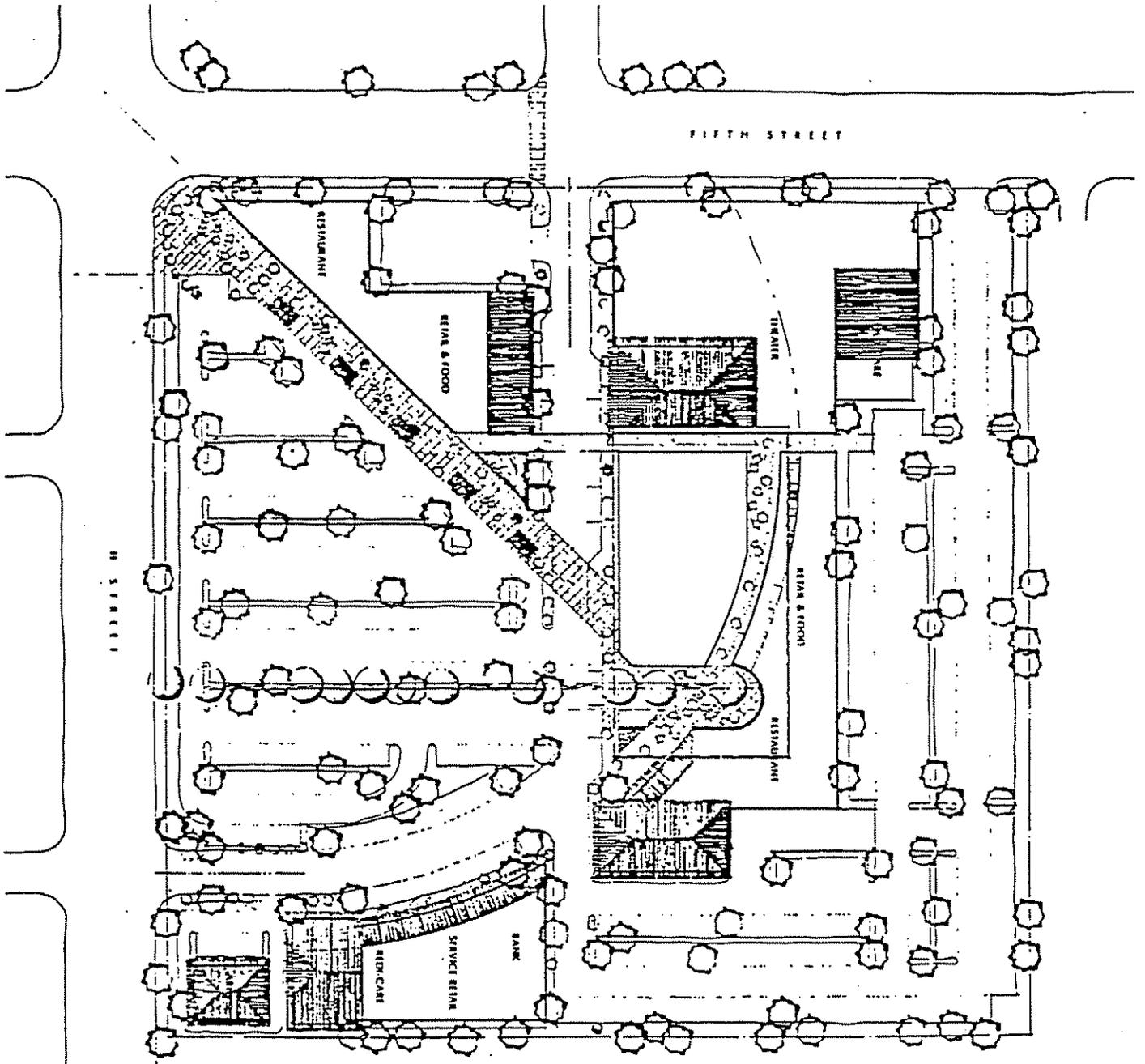
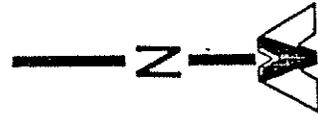


"H STREET BUSINESS COALITION"
SITE PLAN

FIGURE 2



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
6343 GREENTRICH DR., SUITE 250, SAN DIEGO, CA 92122



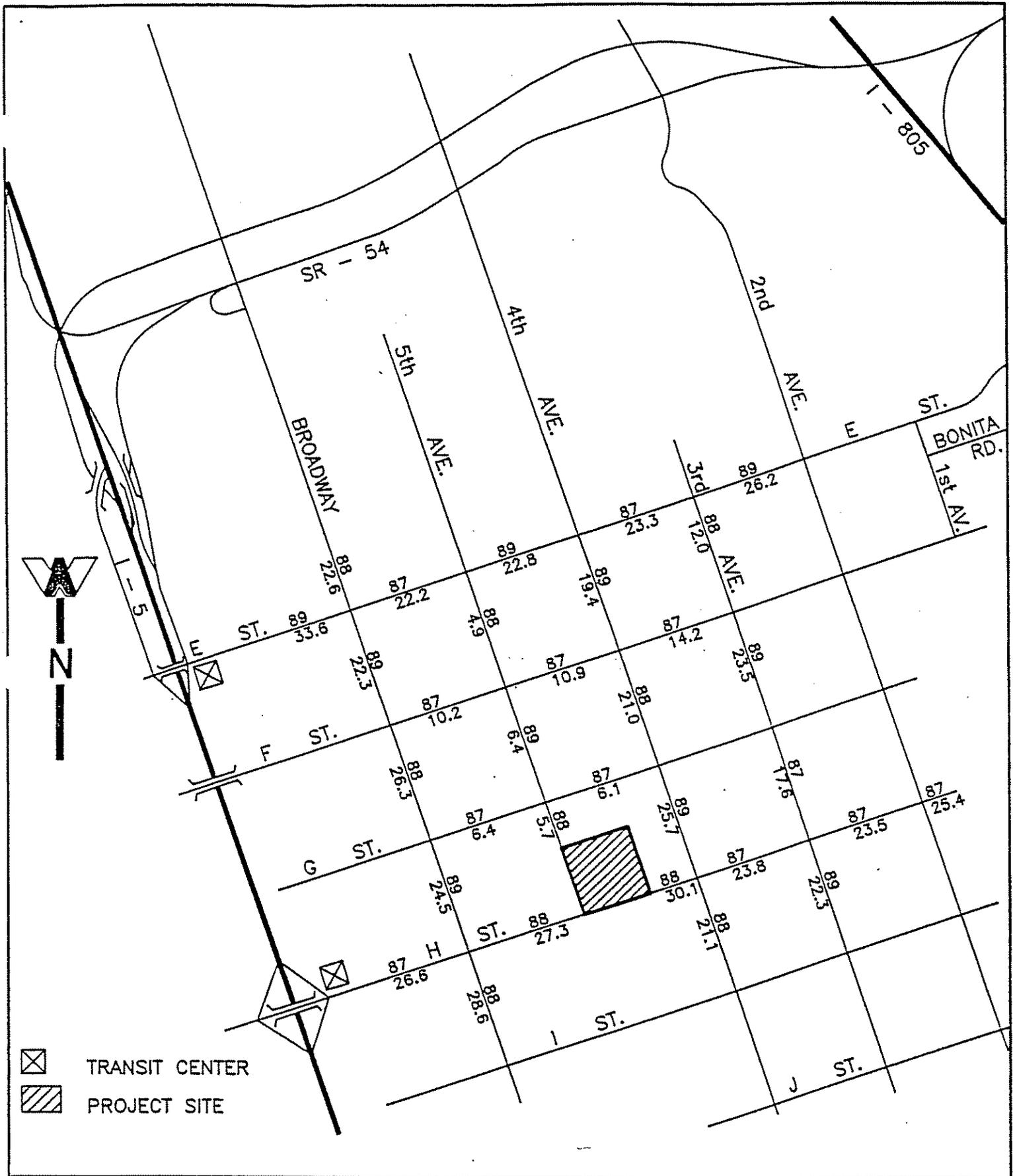
"ALL COMMERCIAL" WENCKE
SITE PLAN

FIGURE 3



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS

8545 GREZYVACH DR., SUITE 250, SAN DIEGO, CA 92122

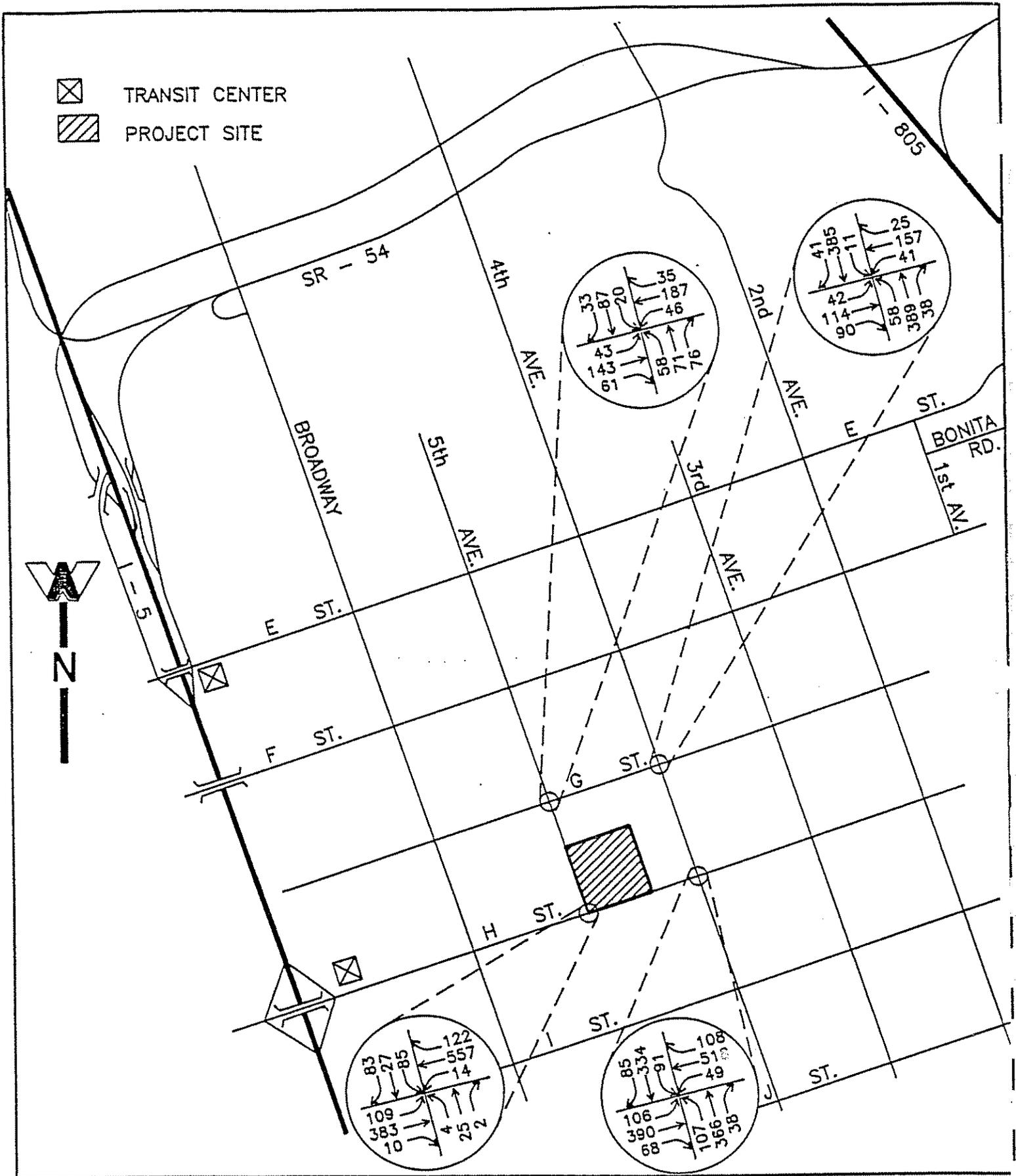


EXISTING ADT'S (87-89)
IN THOUSANDS

FIGURE 4



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
1343 GREGGORY DR., SUITE 250, SAN DIEGO, CA 92122



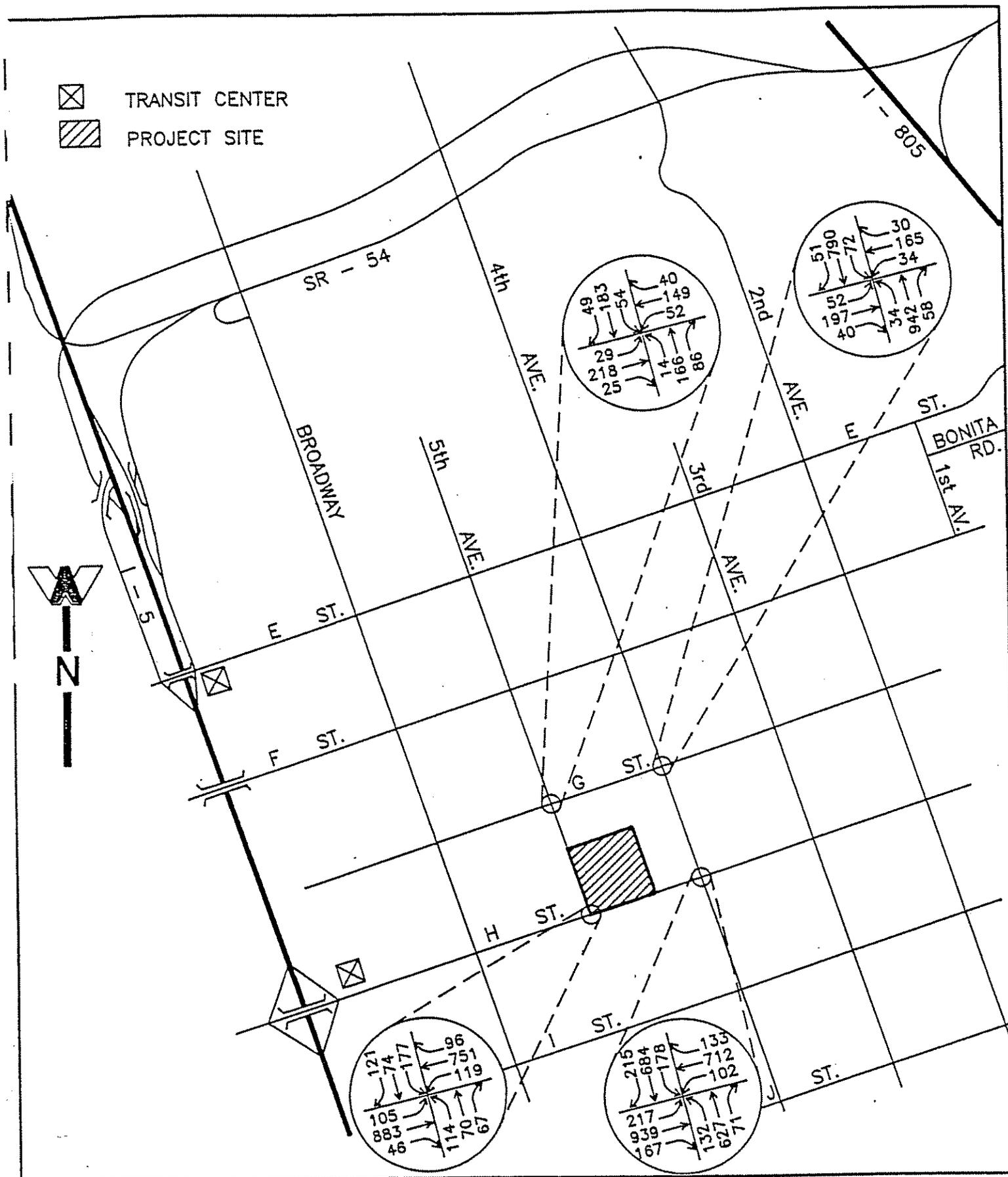
EXISTING AM PEAK HOUR
TURNING MOVEMENTS

FIGURE 5



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 1363 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

- ☒ TRANSIT CENTER
- ▨ PROJECT SITE

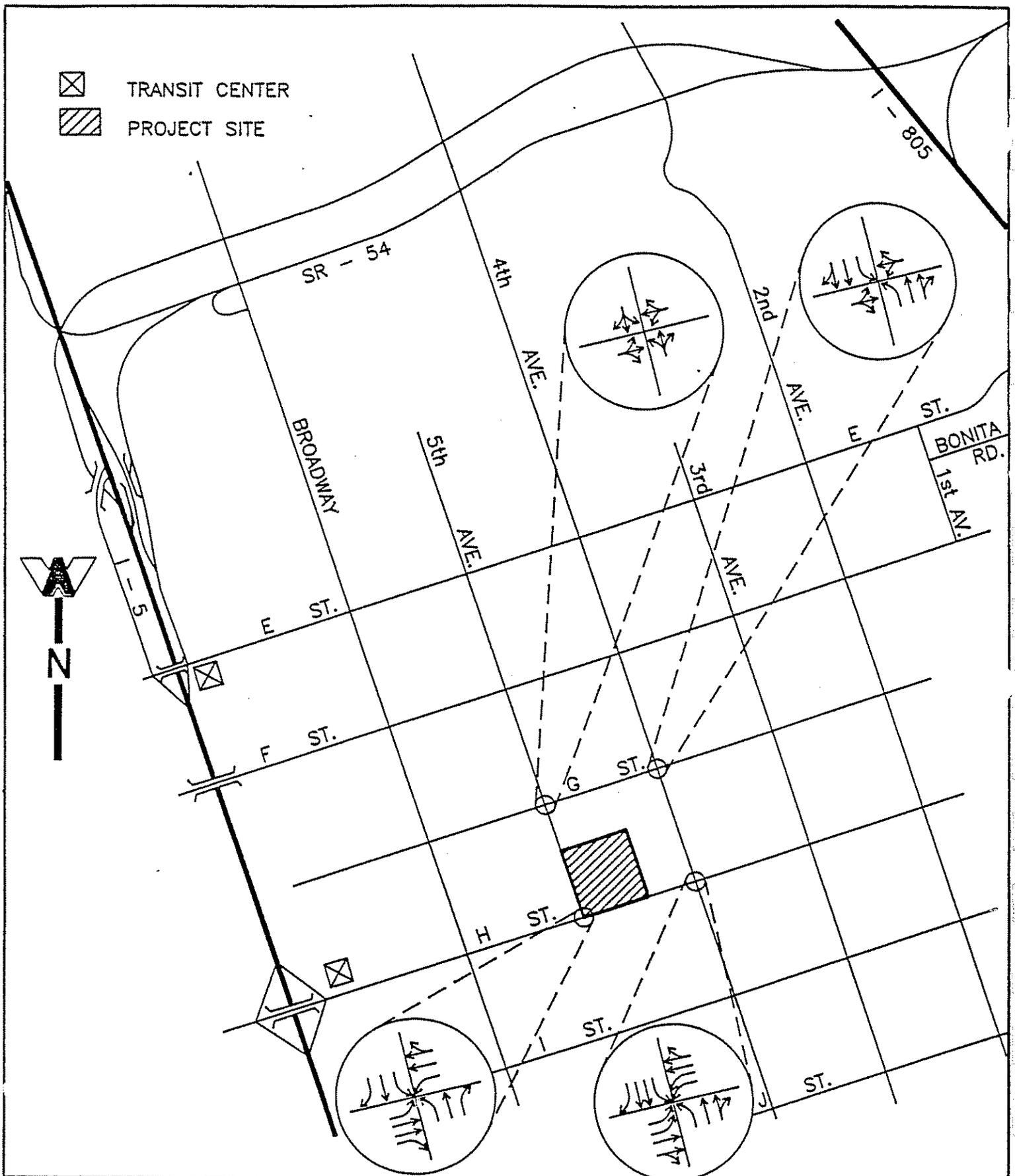


EXISTING PM PEAK HOUR
TURNING MOVEMENTS

FIGURE 6



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
6363 GREENBACH DR., SUITE 250, SAN DIEGO, CA 92122



EXISTING LANE CONFIGURATION

FIGURE 7



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 8363 CREEDMORH DR., SUITE 200, SAN DIEGO, CA 92123

ANALYSIS

To evaluate the potential impacts associated with the project alternatives, the trips expected to be generated by the projects were estimated. The distribution patterns contained in the aforementioned EIR were utilized to distribute and assign alternative projects daily and peak hour trips to the surrounding network. Intersection capacities on the surrounding street system were then evaluated under short term cumulative year 1995 conditions for operational performance.

The traffic which will result from the alternative project proposals on the project site were estimated using accepted trip generation rates and peak hour factors. These are based on categories of land uses and are summarized in SANDAG's *Traffic Generators* manual. Table 1 summarizes the generation of additional trips associated with the "H Street Coalition" alternative. It should be noted that these trips would be in addition to the Scripps Memorial Hospital Expansion Phase 1 trips noted in the draft Environmental Impact Report. Table 2 summarizes the generation of trips from the "all commercial" alternative. This alternative would not include the expansion of the Scripps Hospital site.

As shown on Table 1, the "H Street Collision" alternative would generate an additional 3,228 ADT with 146 trips (splitting 90 inbound and 56 outbound) during the AM peak hour and 290 trips (splitting 142 inbound and 148 outbound) during the PM peak hour. As shown on Table 2, the "all commercial" alternative would generate 12,313 ADT with 574 trips (splitting 325 inbound and 249 outbound) during the AM peak hour and 1,056 trips (splitting 580 inbound and 476 outbound) during the PM peak hour. Therefore, both alternative proposals would generate more trips than the proposed project submittal. Since both proposals contain commercial uses and a significant amount of commercial trips are passer-by trips, the external trip generation would be reduced for the purpose of analyzing "worst case" conditions, trips at the driveways reflect the above mentioned gross traffic appreciation rates.

The distribution of trips typically results from an estimate of ultimate travel destinations and routes used to reach those destinations. The basis for choosing a route is the drivers consideration of time, distance, and convenience. A major element is access to the regional circulation system and the interaction between residential, employment, and retail land use centers. The trip distribution from the original EIR was utilized as the basis of assigning daily and peak hour trips from both project alternatives to the street network.

The short term cumulative conditions were analyzed under year 1995 conditions referencing the year 1995 SANDAG Series 7 forecast with the Eastern Territories "approved projects" travel forecasts prepared by Willdan Associates and included in the Eastern Chula Vista Transportation Phasing Plan (ECVTPP). The short term impacts took into account the construction of State Route 54 between Interstate 5 and 805. The traffic volumes resulting from the effect of cumulative development including the Scripps Hospital Phase 1 Expansion are for year 1995 and are depicted on Figure 8. Figures 9 and 10 illustrate the year 1995 with Phase 1 AM and PM peak hour turning movements, respectively at key intersections in the project vicinity. Figure 11 indicates the year 1995 plus "H Street

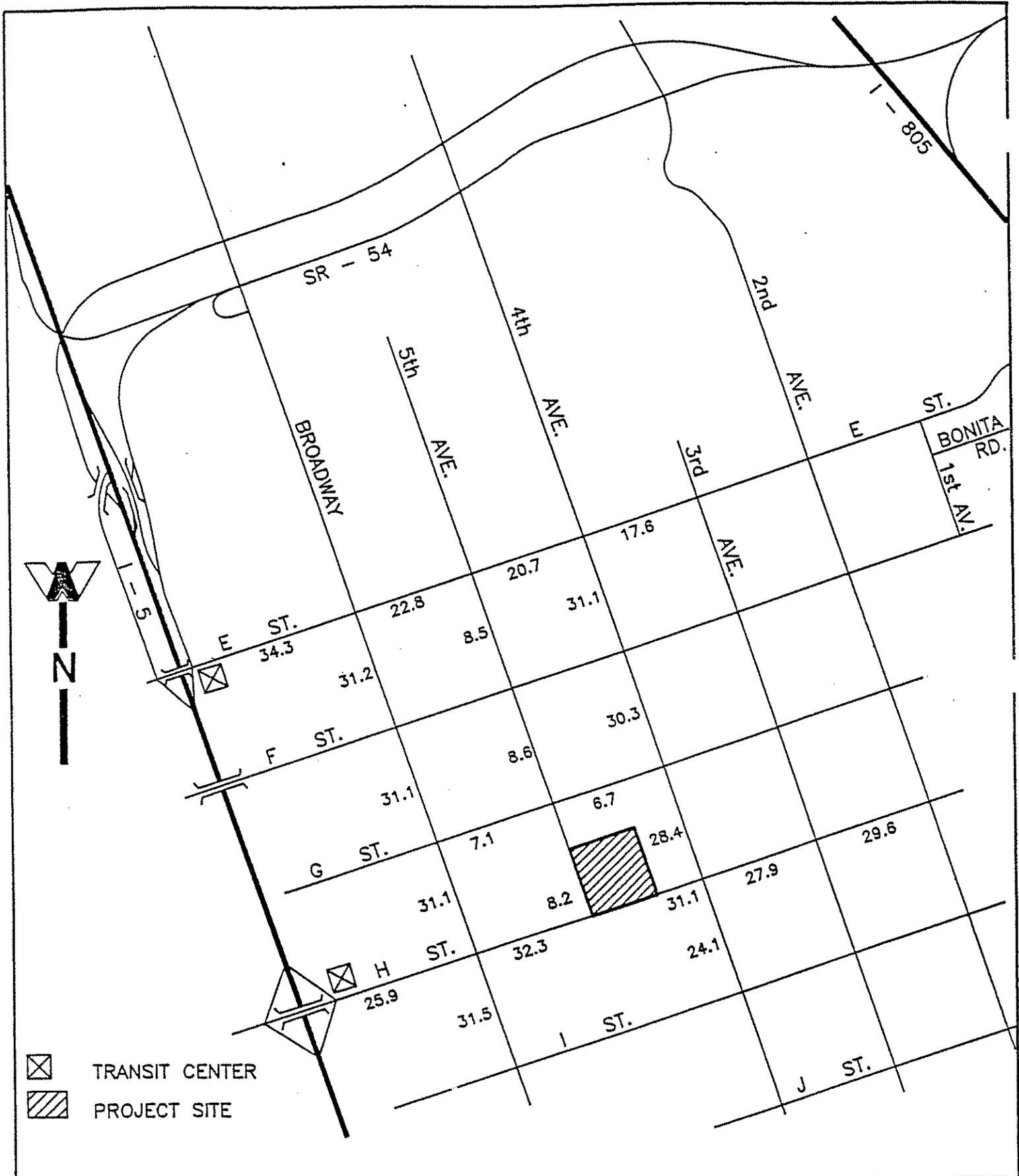


Table 1									
Trip Generation "H Street Business Coalition"									
Land Use	Intensity	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Arby's	2,450 sq. ft.	700/1,000	1,715	4	41	27	8	69	69
First Interstate	6,750 sq. ft.	200/1,000	1,350	5	41	27	10	68	68
Readi Care	3,250 sq. ft.	50/1,000	163	6	8	2	10	5	11
			3,228		90	56		142	148



Table 2									
Trip Generation "All Commercial Alternative"									
Land Use	Intensity	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
				%	In	Out	%	In	Out
Restaurant	10,230 sq.ft.	300/1,000	3,069	8	123	123	6	110	74
Retail	23,400 sq.ft.	40/1,000	936	3	17	11	9	42	42
Food Retail	10,750 sq.ft.	150/1,000	1,612	4	45	19	11	89	89
Service Retail	20,530 sq.ft.	40/1,000	821	3	15	10	9	37	37
Theatre	24,000 sq.ft.	80/1,000	1,920	0.3	---	---	8	108	46
Roller Rink	20,000 sq.ft.	40/1,000	800	4	19	13	9	43	29
First Interstate Bank	6,500 sq.ft.	200/1,000	1,300	5	39	25	10	65	65
Arby's	2,000 sq.ft.	700/1,000	1,400	4	34	22	8	56	56
Readi Care	3,500 sq.ft.	50/1,000	175	6	9	2	10	5	13
Child Care	4,000 sq.ft.	70/1,000	280	17	24	24	18	25	25
			12,313		325	249		580	476





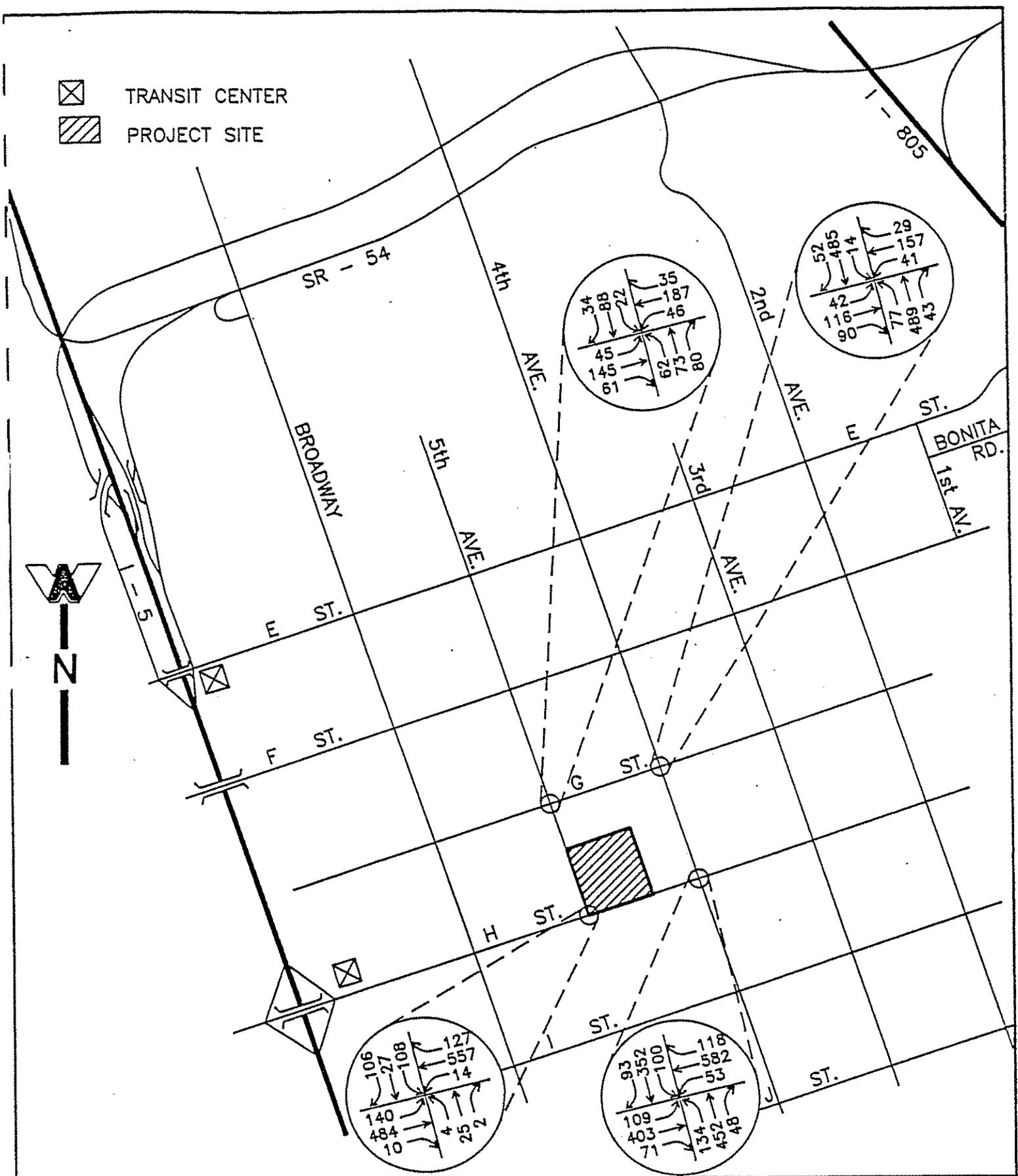
YR 1995 + PH I EXPANSION ADT'S
IN THOUSANDS

FIGURE 8



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
6363 GREGORY DR., SUITE 250, SAN DIEGO, CA 92122

- ☒ TRANSIT CENTER
- ▨ PROJECT SITE



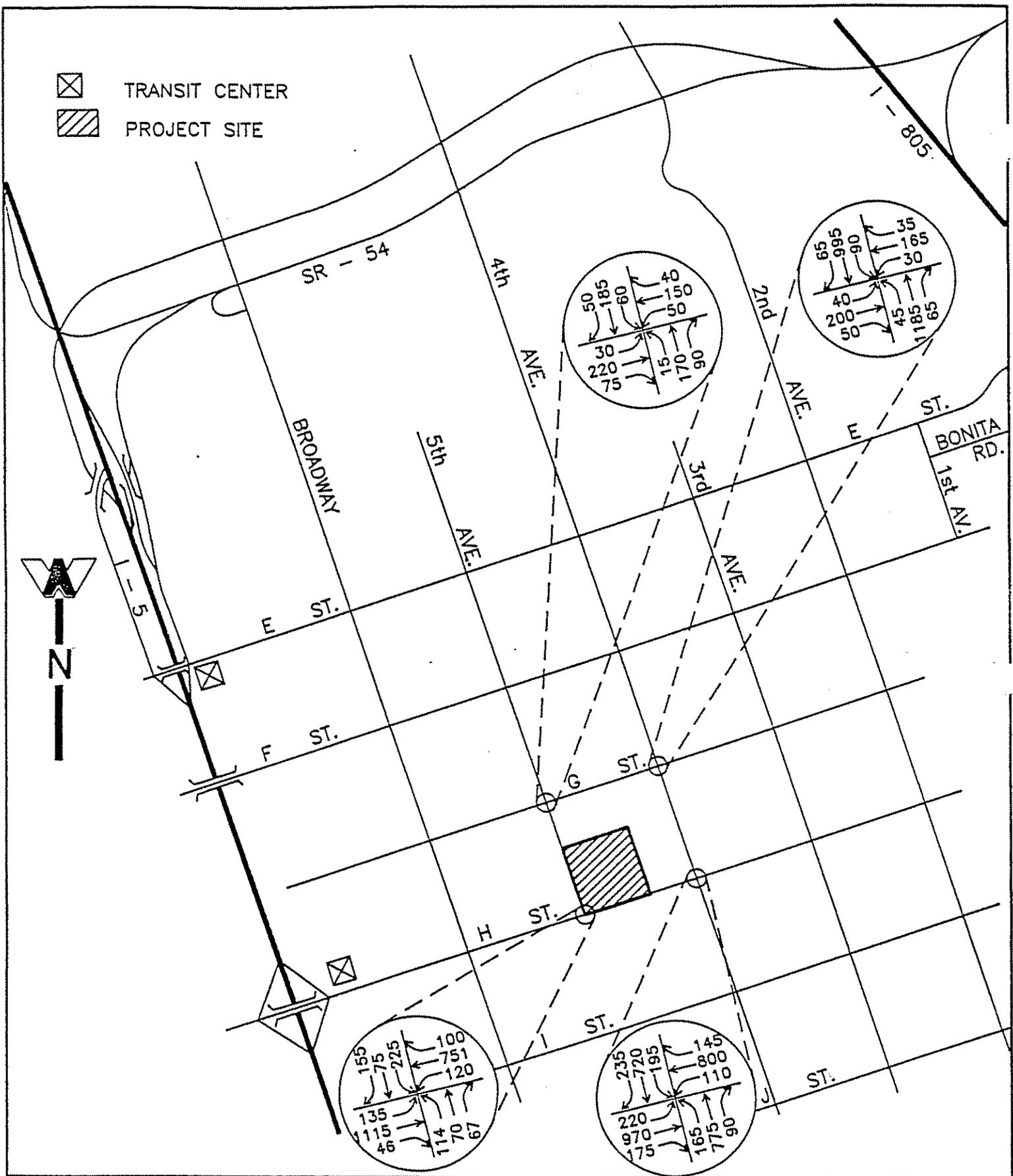
YEAR 1995 W/PHASE I AM PEAK HOUR
TURNING MOVEMENTS

FIGURE 9



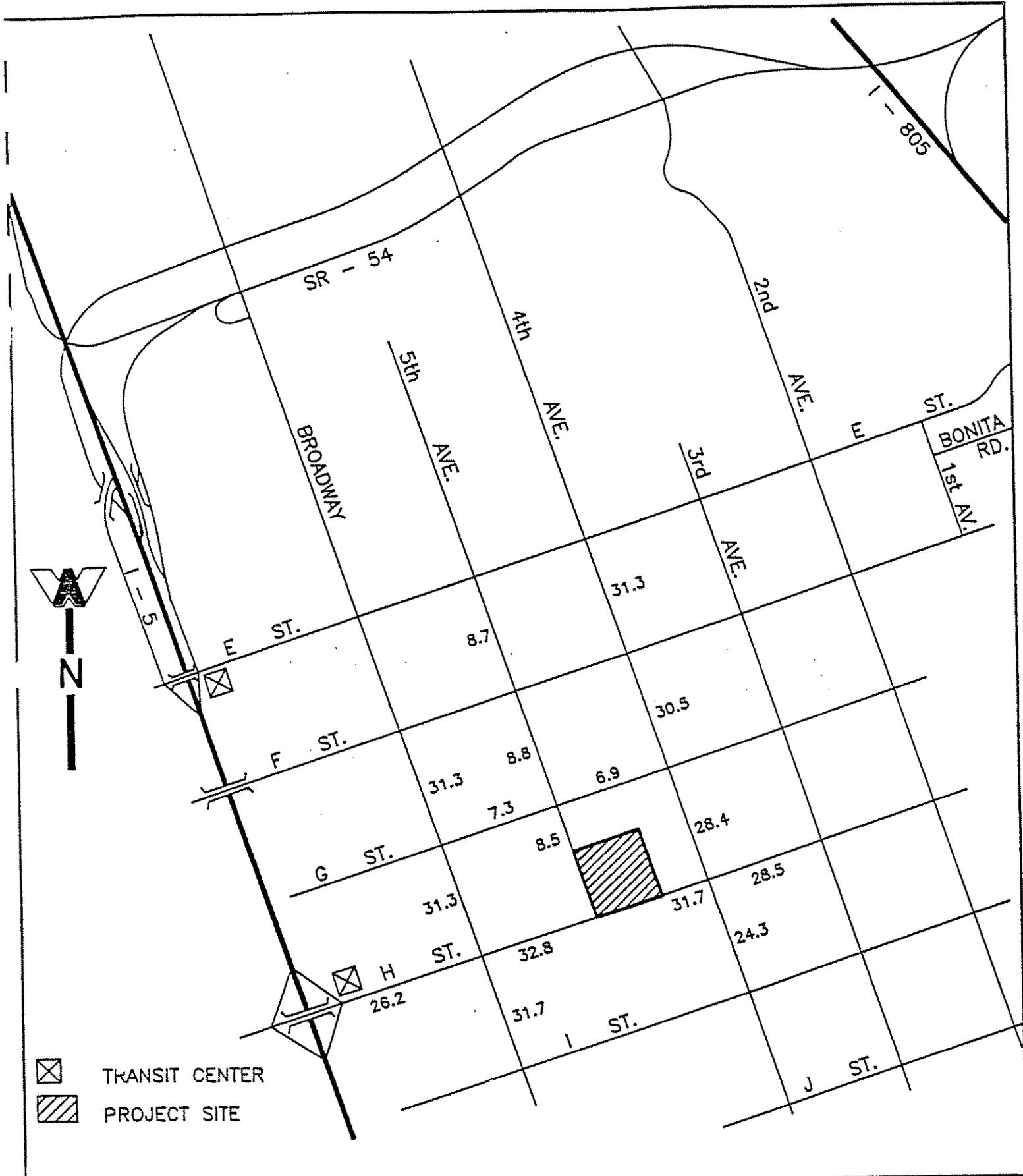
WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
6343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92122

- ☒ TRANSIT CENTER
- ▨ PROJECT SITE



YEAR 1995 W/PHASE I PM PEAK HOUR
TURNING MOVEMENTS

FIGURE 10



YR 1995 + "H" ST. COALITION ADT'S
IN THOUSANDS

FIGURE 11

Coalition" ADT's in the project vicinity. Figures 12 and 13 illustrate the year 1995 plus "H Street Coalition" AM and PM peak hour turning movements, respectively at key intersections in the project vicinity. Figure 14 depicts year 1995 plus "all commercial" alternative ADT's on the surrounding street network. Figures 15 and 16 illustrate the year 1995 plus "all commercial" alternatives AM and PM peak hour turning movements, respectively at key intersections in the project vicinity.

Table 3 contains a comparison of the intersection operations by alternative for the key intersections in the project vicinity. The signalized intersections were evaluated using the Intersection Capacity Utilization (ICU) methodology specified by the City of Chula Vista. Hourly lane capacities of 1,500 and 1,700 vehicles per hour of green time for turn lanes and through lanes, respectively were used in this analysis. The lost time allowance calculation factor is 0.10. The analysis worksheets along with a description of conditions and ICU value ranges for the various levels of service are included as attachments to this letter.

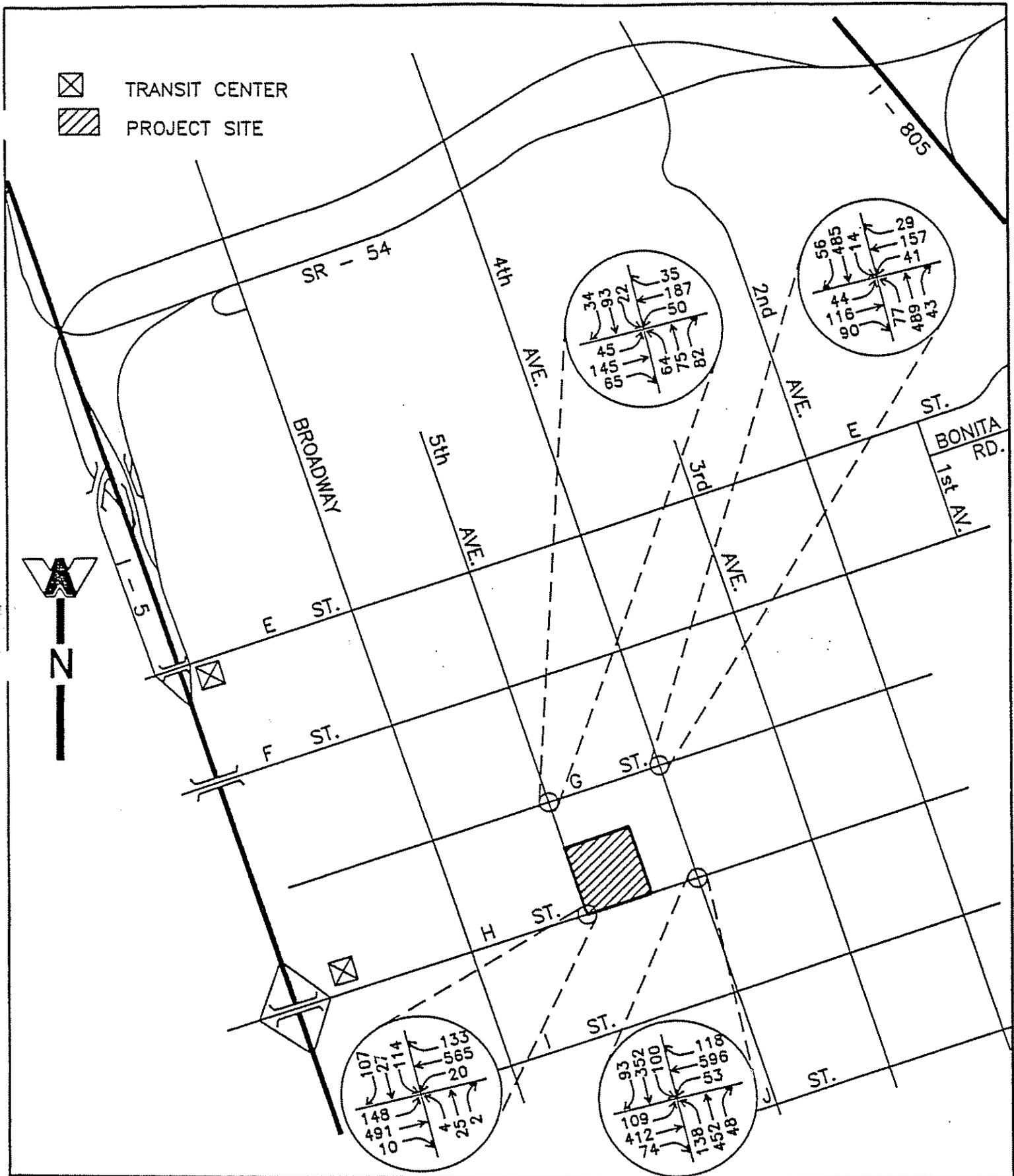
As shown on Table 3, all of the intersections are operating at level of service C or better under existing morning and evening peak hour conditions. However, it should be noted that the narrow lane widths on H Street west of Fourth Avenue along with turning movements to and from the shopping center south of H Street tend to create side friction and effect capacity in this corridor. Specifically, H Street west of Fourth Avenue has substandard geometrics at this time. The north side of this roadway consist of two 10-foot travel lanes and a five foot sidewalk immediately adjacent to an apartment wall. Besides reducing capacity adjacent to the H Street/Fourth Avenue signalized intersection, drivers tend to feel "cramped" and unsure of overall roadway conditions. This situation prohibits the possibility of eastbound to westbound U-turns at Fourth Avenue on H Street.

Also contained on Table 3 are comparison of the year 1995 plus Scripps Hospital Expansion phase 1, year 1995 plus phase 1 plus "H Street Coalition" alternative and year 1995 plus all commercial land use alternative. All intersections are projected to operate at level of service A or B during the morning peak hour, however LOS D is projected at the H Street/Fourth Avenue and G Street/Fourth Avenue signalized intersections under PM peak hour conditions for all three alternatives.

In order to evaluate the proposed access from the "H Street Business Coalition" alternative and "all commercial" alternative, it was necessary to assign the AM and PM peak hour trips to and from their respective driveways. Figures 17 and 18 depict the year 1995 AM and PM peak hour turning movements at the respective driveway locations for both projects. The methodology used to analyze these access driveways is the unsignalized intersection methodology described *Transportation Research Board Special Report 209, 1985 Highway Capacity Manual*. Table 4 contains a summery of the level of service for both "H Street Business Coalition" alternative and "all commercial" alternatives as points to H Street and Fifth Avenue.

As shown on Table 4, it is apparent that the access driveways proposed by both alternatives will provide level of service C or better with the exception of the REDI Care driveway for the "H Street Business Coalition" to Fifth Avenue operating at level of service E during the PM peak hour for left turns from the minor approach. It should be noted that southbound left turning vehicles from Fifth Avenue will not have a left turn pocket due to transitioning of the southbound Fifth Avenue left turn pocket at the H Street/Fifth Avenue signalized



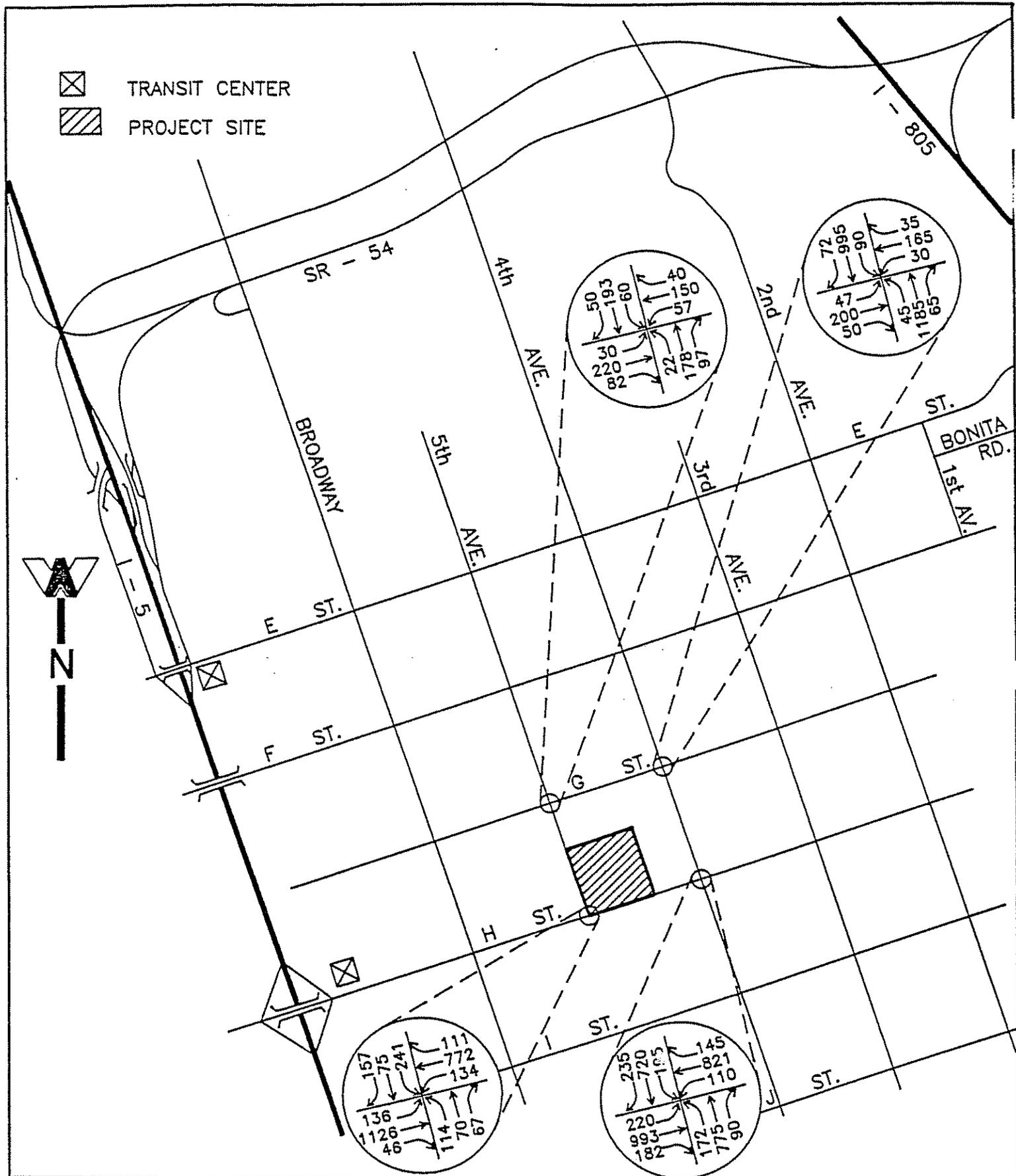


YEAR 1995 + "H" STREET COALITION
 AM PEAK HOUR
 TURNING MOVEMENTS

FIGURE 12



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6363 GREENBUSH DR., SUITE 250, SAN DIEGO, CA 92122

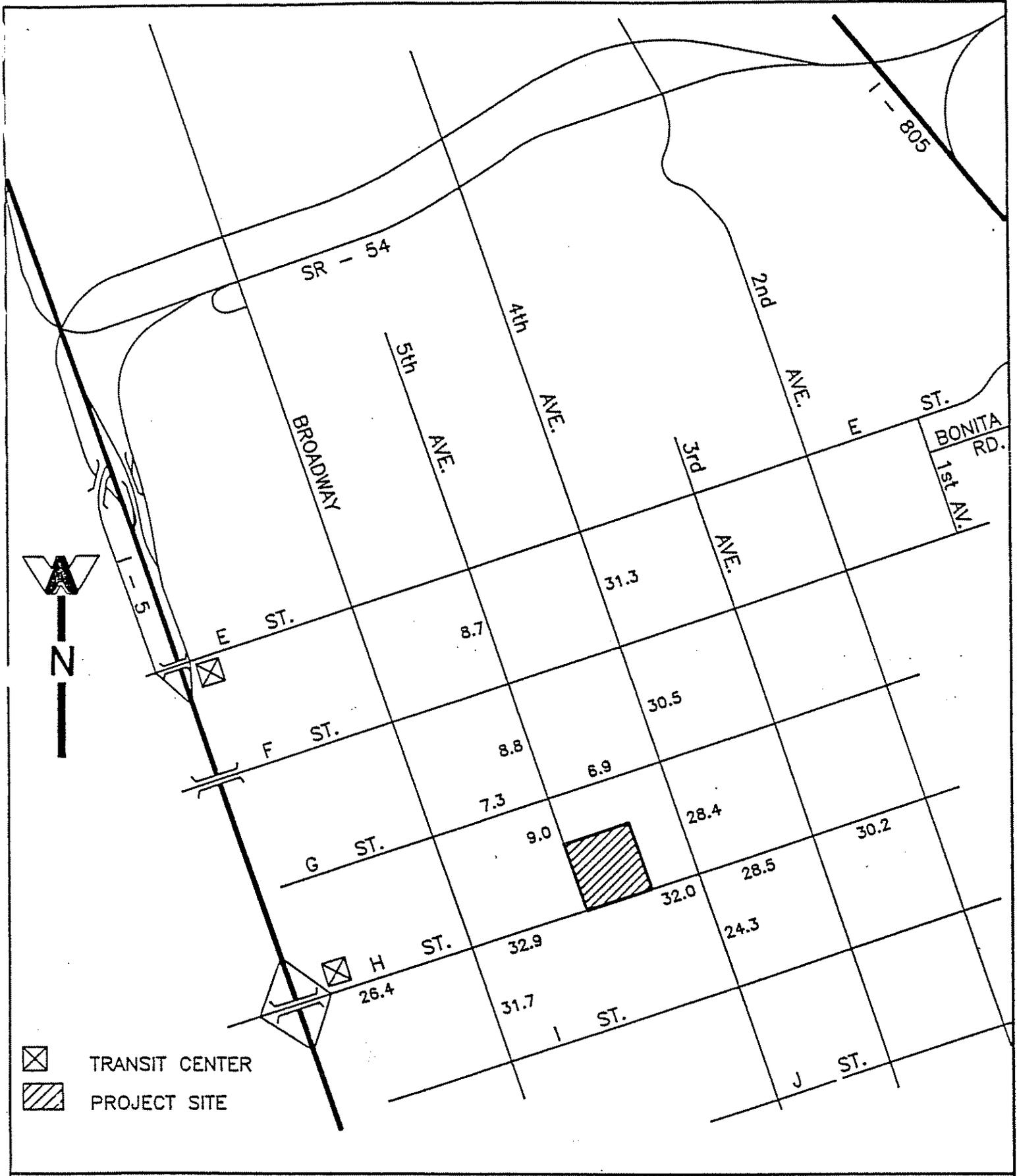


YEAR 1995 + "H" STREET COALITION
 PM PEAK HOUR
 TURNING MOVEMENTS

FIGURE 13



WILLDAN ASSOCIATES
 CONSULTING ENGINEERS AND PLANNERS
 6363 GREGORY DR., SUITE 220, SAN DIEGO, CA 92121

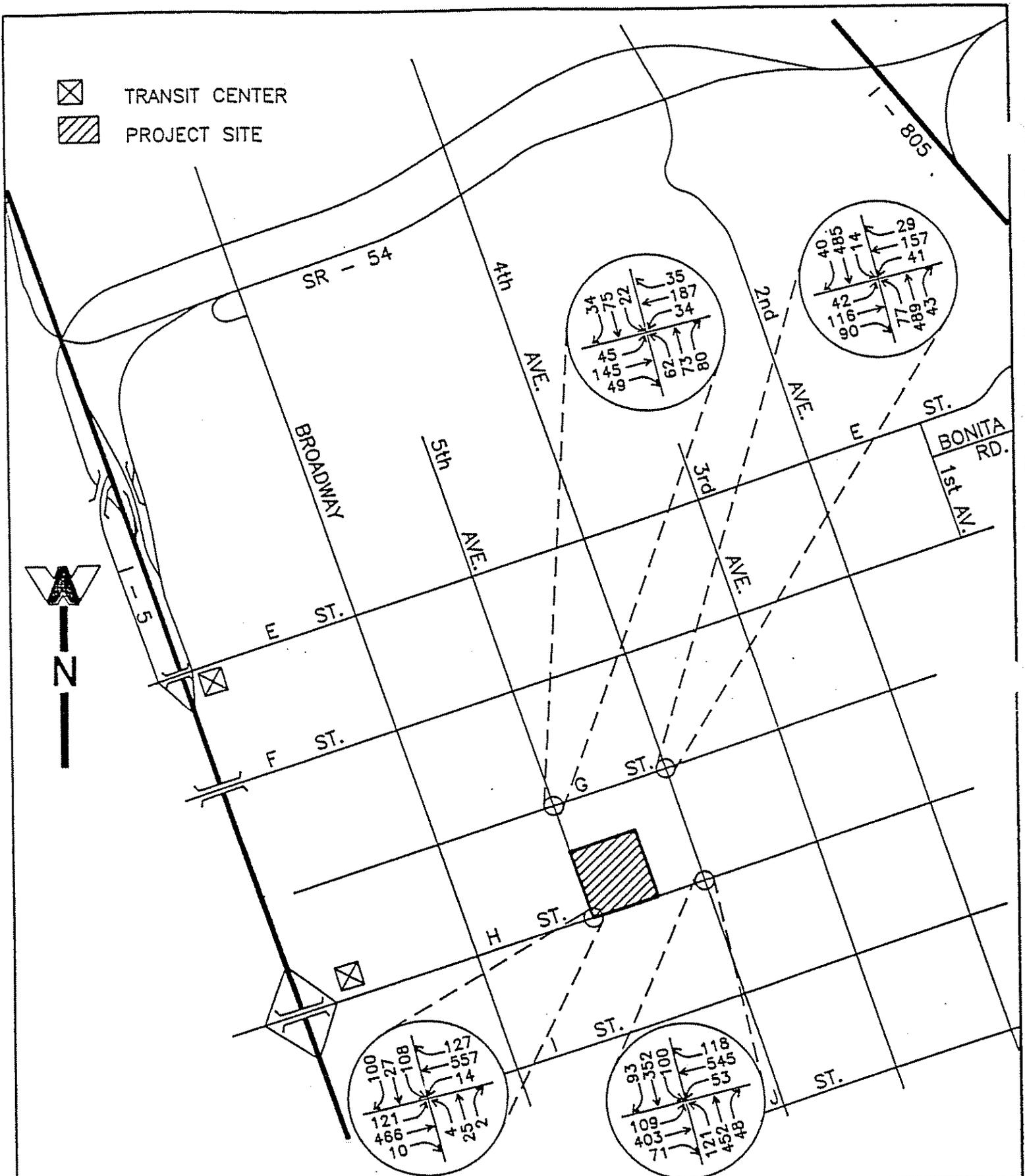


TRANSIT CENTER
 PROJECT SITE

'R 1995 + "ALL COMMERCIAL ALT." ADT'S
 IN THOUSANDS

FIGURE 14

- ☒ TRANSIT CENTER
- ▨ PROJECT SITE

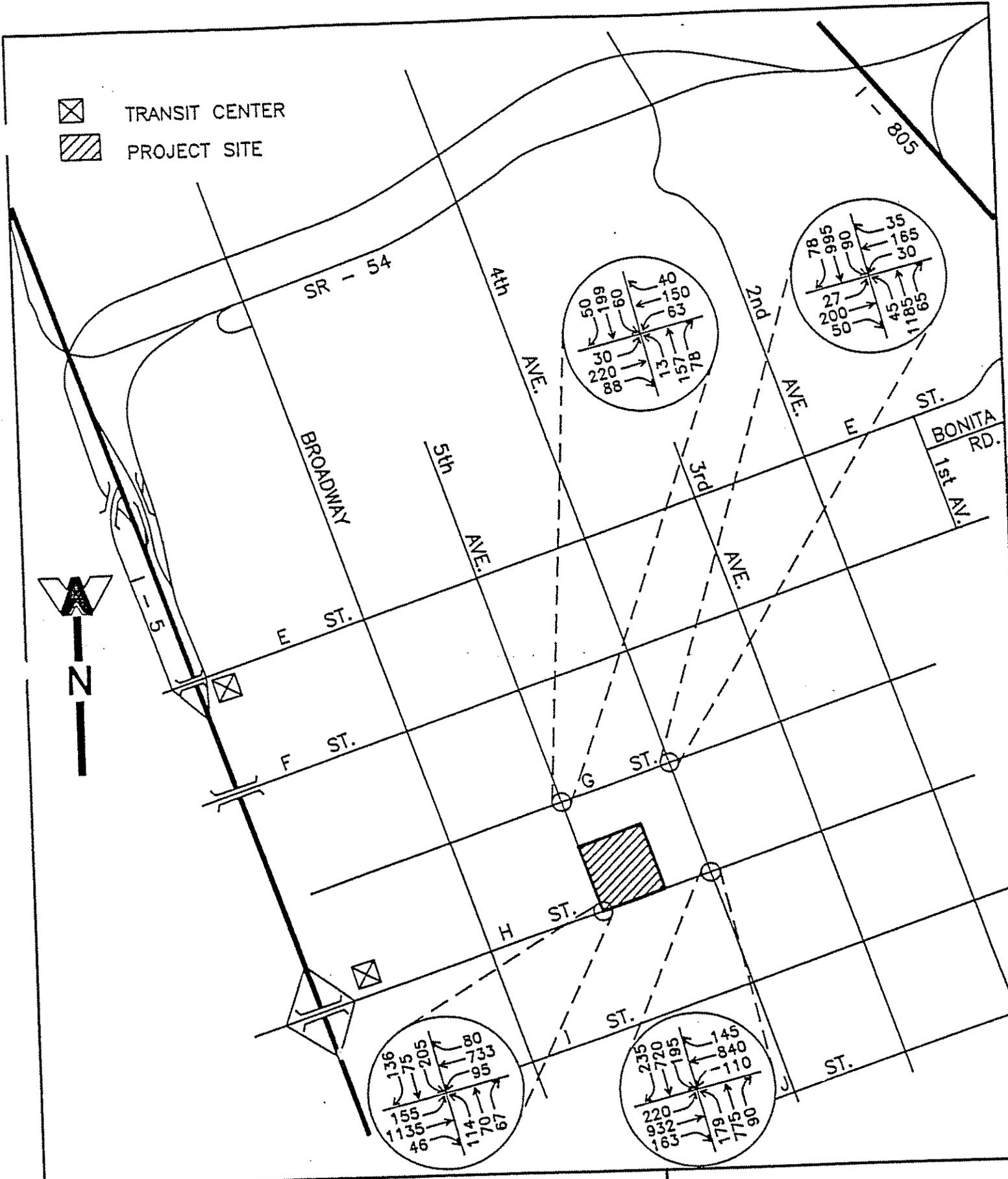


YEAR 1995 "ALL COMMERCIAL ALT."
AM PEAK HOUR
TURNING MOVEMENTS

FIGURE 15



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
1363 GNEEDYBACH DR., SUITE 230, SAN DIEGO, CA 92112



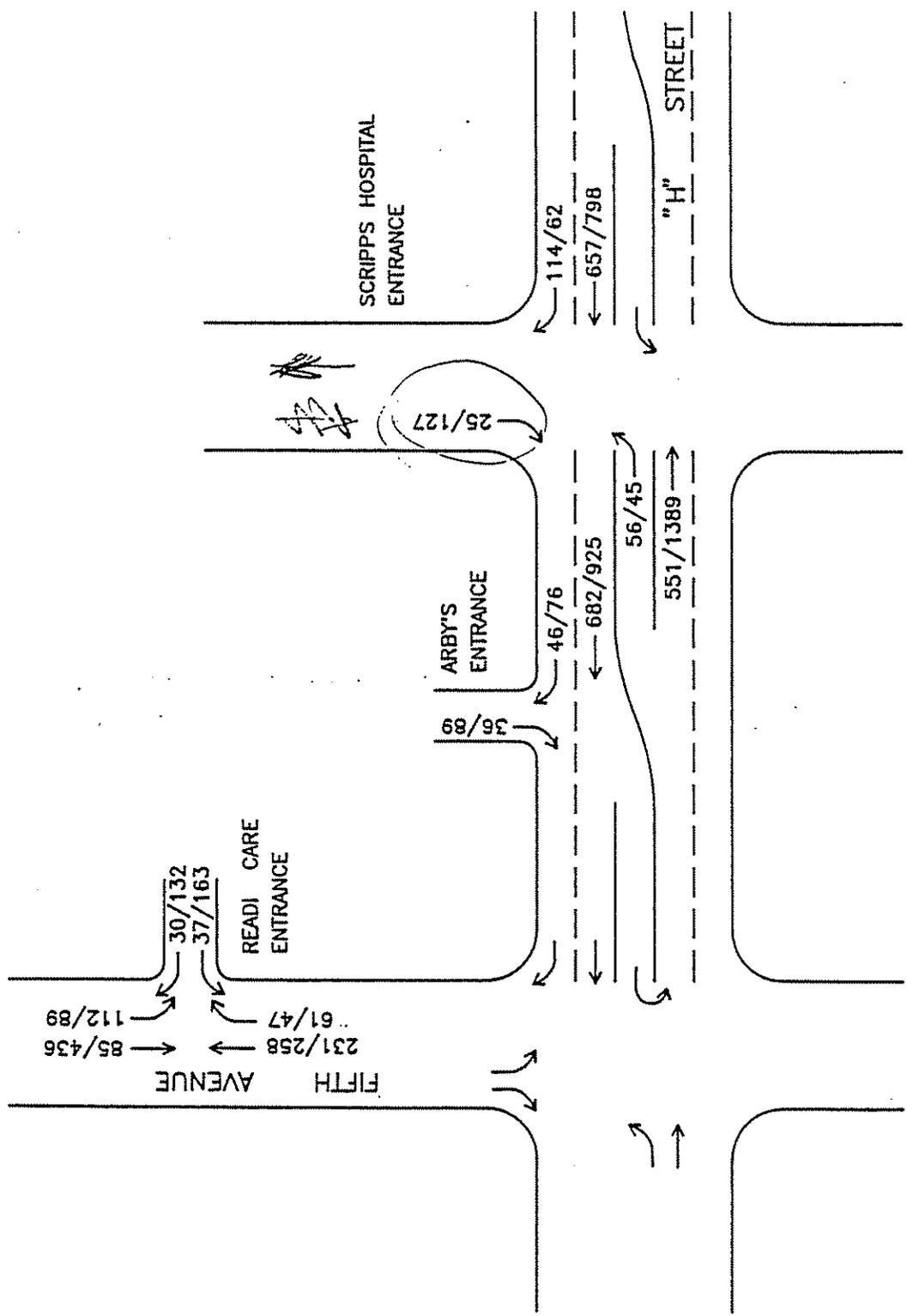
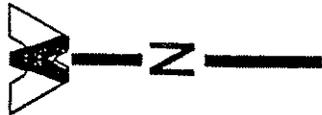
YEAR 1995 "ALL COMMERCIAL ALT."
 PM PEAK HOUR
 TURNING MOVEMENTS

FIGURE 16

Table 3
Comparison of Intersection Operations by Alternative

Intersection	Existing						1995 + Phase 1						1995 + Phase 1 + H Street Coalition						1995 + All Commercial Alternative					
	AM			PM			AM			PM			AM			PM			AM			PM		
	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS		
H Street/Fourth Avenue	0.50	A	0.78	C	0.56	A	0.86	D	0.56	A	0.87	D	0.56	A	0.87	D	0.55	A	0.84	D	0.55	A	0.84	D
H Street/Fifth Avenue	0.44	A	0.60	A	0.48	A	0.70	B	0.49	A	0.72	C	0.49	A	0.72	C	0.47	A	0.67	B	0.47	A	0.67	B
G Street/Fourth Avenue	0.54	A	0.75	C	0.59	A	0.83	D	0.59	A	0.84	D	0.59	A	0.84	D	0.59	A	0.83	D	0.59	A	0.83	D
G Street/Fifth Avenue	0.61	B	0.73	C	0.62	B	0.77	C	0.63	B	0.79	C	0.63	B	0.79	C	0.59	A	0.78	C	0.59	A	0.78	C

ICU = Intersection Capacity Utilization
LOS = Level of Service

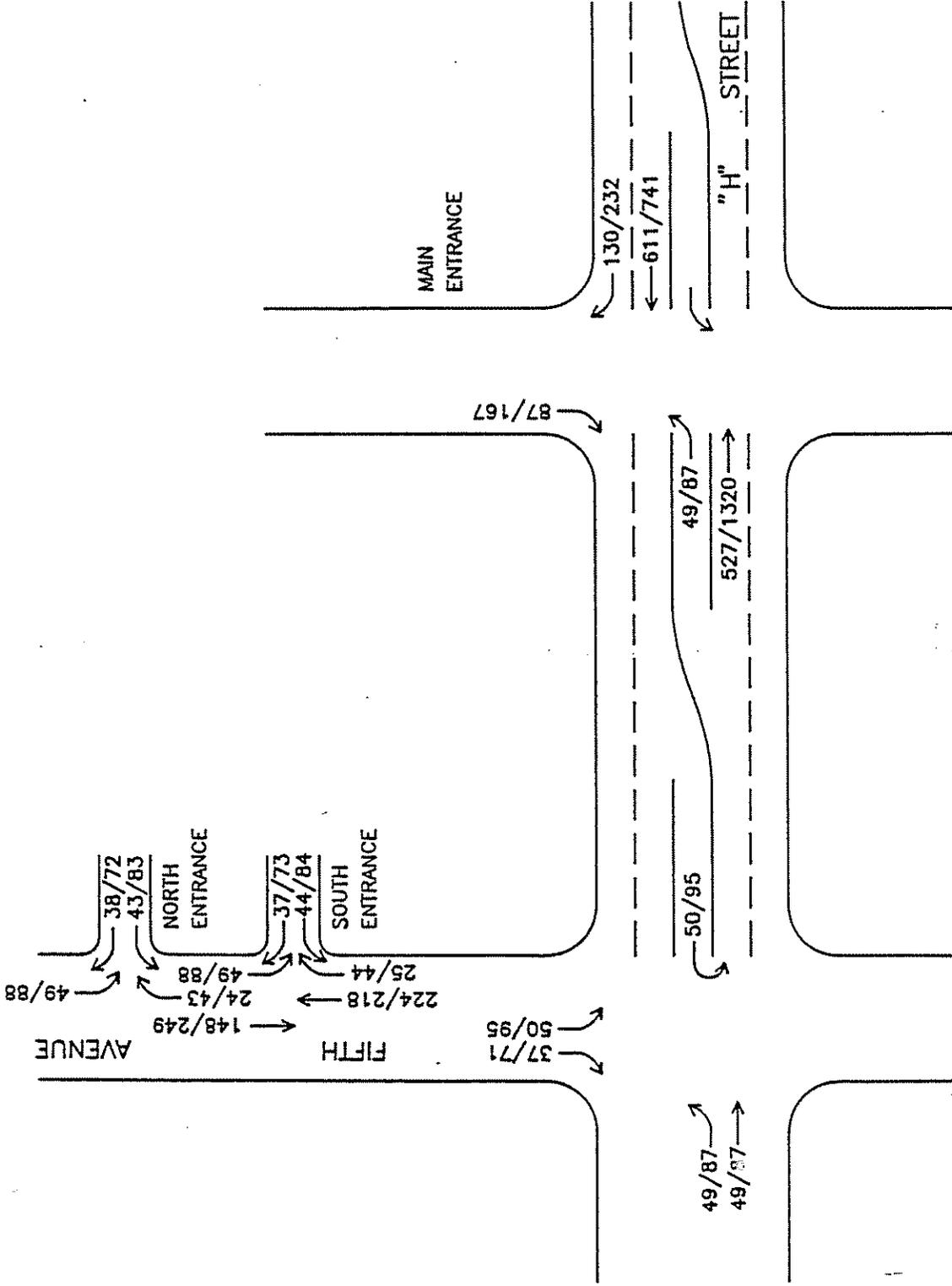
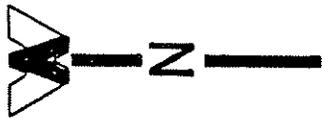


YR. 1995 + PH NO.1 + "H" STREET COALITION
TURNING MOVEMENTS
AM/PM

FIGURE 17



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
8343 GREENHILL DR., SUITE 250, SAN DIEGO, CA 92122



YR. 1995 + "ALL COMMERCIAL ALT."
DRIVEWAY TURNING MOVEMENTS
AM/PM

FIGURE 18



WILLDAN ASSOCIATES
CONSULTING ENGINEERS AND PLANNERS
8343 GREENWICH DR., SUITE 250, SAN DIEGO, CA 92123

Table 4 Level of Service for Project Access Locations				
Intersection	AM Peak Hour		PM Peak Hour	
	Left turn from major	Minor	Left turn from major	Minor
1995 + Phase 1 + "H Street Business Coalition":				
<u>H Street</u> main driveways	A	A	A	A
<u>H Street</u> Arby's driveway	N/A	A	N/A	A
<u>Fifth Avenue</u> Readi Care driveway	A	A	A	E
1995 + "All Commercial Alternative":				
<u>H Street</u> main access	A	A	B	A
<u>Fifth Avenue</u> south driveway	A	A	A	B
<u>Fifth Avenue</u> north driveway	A	A	A	B

N/A = not applicable



intersection.

The respective site plans indicate that the main driveway into the complex from H Street is proposed to contain left turns in and right turns in and out only. The proposed Arby's driveway would be restricted to right turns in and out only. All driveways proposed to and from Fifth Avenue are proposed as full access driveways allowing left turns in and out as well as right turns in and out.

It should be noted, that potential conflicts may occur at the right turn in and out driveway serving the Arby's restaurant due to close proximity to the Scripps Memorial Hospital Phase I expansion driveway. This could occur when vehicles making left turns and U-turns from eastbound H Street conflict with vehicles exiting the Scripps Hospital main driveway and/or entering-exiting the Arby's driveway to the west. The addition of an Arby's driveway would necessitate the Scripps Hospital driveway to H Street to be converted to two-way operation instead of the proposal ingress only.

SUMMARY AND CONCLUSIONS

In summary, since the time the Scripps Memorial Hospital expansion draft Environmental Impact Report was circulated for public review, the City of Chula Vista received two alternative proposals for the project site. The "H Street Business Coalition" site plan would generate 3,228 daily trips with 146 occurring during the AM peak hour and 290 occurring during the PM peak hour. The Wennke "all commercial" alternative is estimated to generate 12,313 daily trips with 574 trips estimated to occur during the AM peak hour and 1,056 trips estimated to occurring during the PM peak hour. Due to the fact the land uses for both alternative projects are commercial, a percentage of the trips will be diverted from the existing traffic stream (passer-by trips).

Both alternative projects daily, AM and PM peak hour trips were distributed and assigned to the street system in accordance with distribution patterns documented in the draft EIR. The signalized intersections at H Street/Fourth Avenue, H Street/Fifth Avenue, G Street/Fourth Avenue, and G Street/Fifth Avenue are projected to operated at levels of service in conformance with the City of Chula Vista's threshold standards under all alternatives tested.

The site plans for both alternative projects were analyzed for potential constraints and access locations to the street system tested for level of service performance. After analysis of the proposed access locations, it was found that most access locations will provide high levels of service during both AM and PM peak hour periods. However, it should be noted that the driveway along H Street serving the Arby's restaurant is in close proximity to the main entrance to the Scrips Memorial Hospital expansion project. This could lead to potential auto conflicts with turning vehicles to and from each of the driveways.

Also, it was noted that the driveway to Fifth Avenue was in close proximity to the H Street/Fifth Avenue signalized intersection and could interfere with southbound left turns into the project from Fifth Avenue. Widening the north side of H Street by two to four feet will be necessary to accommodate a raised median along H Street. It should be noted that the additional driveway (Arby's) would tend to create a greater amount of "side



friction" and providing a westbound auxiliary lane would improve access to and from land uses on the north side of H Street.

After analyzing year 1995 conditions with the Scripps Memorial Hospital Phase 1, the "H Street Business Coalition" proposal, and a 1995 condition with "all commercial" uses, it was determined that these projects would not significantly impact the surrounding street system but could lead to a number of operational problems in the project vicinity. Therefore, widening of H Street to 6 lanes will not be necessary to accommodate additional traffic volumes generated from either of these developmental proposals. However, a raised median should be constructed between Fifth Avenue and the existing median just west of Fourth Avenue with an opening to allow left turns in to the proposed project main driveway. Also, to help accommodate additional turning movements along H Street, it is recommended that a westbound auxiliary lane be constructed from the eastern Scripps Hospital boundaries to Fifth Avenue.

Thank you for the opportunity of reviewing and analyzing both these development proposals. If you have any questions, please feel free to contact Joe Oliva or myself.

Sincerely,

WILLDAN ASSOCIATES



George Fares, P.E.
Division Manager
Transportation Division



Joseph J. Oliva
Senior Transportation Planner

GF:JJO:sg
JN 03959



ATTACHMENTS



Table A-1 Descriptions of Conditions for Various Levels of Service	
Levels of Service	Operating Conditions
A	Free flow; speed controlled by driver's desires, speed limits, or physical roadway conditions.
B	Stable flows; operating speeds beginning to be restricted; little or not restrictions on maneuverability from other vehicles.
C	Stable flow; speeds and maneuverability more closely restricted.
D	Approaches unstable flow; tolerable speeds can be maintained, but temporary restrictions to flow cause substantial drops in speed. Little freedom to maneuver, comfort and convenience low.
E	Volumes near capacity; flow unstable; stoppage of momentary duration. Ability to maneuver severely limited.
F	Forced flow; low operating speeds; volumes below capacity, queues form.

Table A-2 Level of Service Ranges Maximum Sum of Critical Volumes in VPH	
Level of Service	Typical V/C Ratio
A	0.00 - 0.60
B	0.61 - 0.70
C	0.71 - 0.80
D	0.81 - 0.90
E	0.91 - 1.00
	varies



<p style="text-align: center;">Table A-3</p> <p style="text-align: center;">Level of Service and Expected Delay For Reserve Capacity Ranges</p> <p style="text-align: center;"><u>Unsignalized Intersections</u></p>		
Reserve Capacity	Level of Service	Expected Traffic Delay
400 or More	A	Little or No Delay
300 to 399	B	Short Traffic Delays
200 to 299	C	Average Traffic Delays
100 to 199	D	Long Traffic Delays
0 to 99	E	Very Long Traffic Delays
Less than 0	E	Failure - Extreme Congestion
(Any Value)	F	Intersection Blocked by External Causes



N/S STREET: FOURTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959

FILE: HSFAEX

MOVE	EXISTING AM PEAK CONDITIONS			EXISTING PM PEAK CONDITIONS		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	107	1500	0.07	132	1500	0.09
NB THRU	366	3400	0.12 *	627	3400	0.21 *
NB RT	38	0		71	0	
SB LT	91	1500	0.06 *	178	1500	0.12 *
SB THRU	334	3400	0.10	684	3400	0.20
SB RT	85	1500	0.06	215	1500	0.14
EB LT	106	3000	0.04 *	217	3000	0.07
EB THRU	390	3400	0.13	939	3400	0.33 *
EB RT	68	0		167	0	
WB LT	49	3000	0.02	102	3000	0.03 *
WB THRU	518	3400	0.18 *	712	3400	0.25
WB RT	108	0		133	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.50			0.78
LEVEL OF SERVICE			A			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959 FILE: HSFAPP

MOVE	1995+EXP AM PEAK CONDITIONS			1995+EXP PM PEAK CONDITIONS		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	134	1500	0.09	165	1500	0.11
NB THRU	452	3400	0.15 *	775	3400	0.25 *
NB RT	48	0		90	0	
SB LT	100	1500	0.07 *	195	1500	0.13 *
SB THRU	352	3400	0.10	720	3400	0.21
SB RT	93	1500	0.06	235	1500	0.16
EB LT	109	3000	0.04 *	220	3000	0.07
EB THRU	403	3400	0.14	970	3400	0.34 *
EB RT	71	0		175	0	
WB LT	53	3000	0.02	110	3000	0.04 *
WB THRU	582	3400	0.21 *	800	3400	0.28
WB RT	118	0		145	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.56			0.86
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959

FILE: HSFHSC

MOVE	1995+PH 1AM PEAK +H ST ALT			1995+PH 1PM PEAK +H ST ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	138	1500	0.09	172	1500	0.11
NB THRU	452	3400	0.15 *	775	3400	0.25 *
NB RT	48	0		90	0	
SB LT	100	1500	0.07 *	195	1500	0.13 *
SB THRU	352	3400	0.10	720	3400	0.21
SB RT	93	1500	0.06	235	1500	0.16
EB LT	109	3000	0.04 *	220	3000	0.07
EB THRU	412	3400	0.14	998	3400	0.35 *
EB RT	74	0		182	0	
WB LT	53	3000	0.02	110	3000	0.04 *
WB THRU	596	3400	0.21 *	821	3400	0.28
WB RT	118	0		145	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.56			0.87
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959

FILE: HSFAAC

MOVE	1995+ALL AM PEAK COMM ALT			1995+ALL PM PEAK COMM ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	121	1500	0.08	179	1500	0.12
NB THRU	452	3400	0.15 *	775	3400	0.25 *
NB RT	48	0		90	0	
SB LT	100	1500	0.07 *	195	1500	0.13 *
SB THRU	352	3400	0.10	720	3400	0.21
SB RT	93	1500	0.06	235	1500	0.16
EB LT	109	3000	0.04 *	220	3000	0.07
EB THRU	403	3400	0.14	932	3400	0.32 *
EB RT	71	0		163	0	
WB LT	53	3000	0.02	110	3000	0.04 *
WB THRU	545	3400	0.20 *	840	3400	0.29
WB RT	118	0		145	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.55			0.84
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959 FILE: HS5AHSC

MOVE	1995+PH1 AM PEAK +H ST ALT			1995+PH1 PM PEAK +H ST ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	4	1500	0.00	114	1500	0.08
NB THRU	25	1700	0.01 *	70	1700	0.04 *
NB RT	2	1500	0.00	67	1500	0.04
SB LT	114	1500	0.08 *	241	1500	0.16 *
SB THRU	27	1700	0.02	75	1700	0.04
SB RT	107	1500	0.07	157	1500	0.10
EB LT	148	1500	0.10 *	136	1500	0.09
EB THRU	491	3400	0.14	1126	3400	0.33 *
EB RT	10	1500	0.01	46	1500	0.03
WB LT	20	1500	0.01	134	1500	0.09 *
WB THRU	565	3400	0.21 *	772	3400	0.26
WB RT	133	0		111	0	
CLEARANCE			0.1			0.1
RT. TEN. COMPONENT			0			0
ICU			0.49			0.72
LEVEL OF SERVICE			A			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959 FILE: HSFAAC

MOVE	1995+ALL AM PEAK COMM ALT			1995+ALL PM PEAK COMM ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	121	1500	0.08	179	1500	0.12
NB THRU	452	3400	0.15 *	775	3400	0.25 *
NB RT	48	0		90	0	
SB LT	100	1500	0.07 *	195	1500	0.13 *
SB THRU	352	3400	0.10	720	3400	0.21
SB RT	93	1500	0.06	235	1500	0.16
EB LT	109	3000	0.04 *	220	3000	0.07
EB THRU	403	3400	0.14	932	3400	0.32 *
EB RT	71	0		163	0	
WB LT	53	3000	0.02	110	3000	0.04 *
WB THRU	545	3400	0.20 *	840	3400	0.29
WB RT	118	0		145	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.55			0.84
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959

FILE: HS5AEX

MOVE	EXISTING AM PEAK CONDITION			EXISTING PM PEAK CONDITION		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	4	1500	0.00	114	1500	0.08
NB THRU	25	1700	0.01 *	70	1700	0.04 *
NB RT	2	1500	0.00	67	1500	0.04
SB LT	85	1500	0.06 *	177	1500	0.12 *
SB THRU	27	1700	0.02	74	1700	0.04
SB RT	83	1500	0.06	121	1500	0.08
EB LT	109	1500	0.07 *	105	1500	0.07
EB THRU	383	3400	0.11	883	3400	0.26 *
EB RT	10	1500	0.01	46	1500	0.03
WB LT	14	1500	0.01	119	1500	0.08 *
WB THRU	557	3400	0.20 *	751	3400	0.25
WB RT	122	0		96	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.44			0.60
LEVEL OF SERVICE			A			A

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: H" STREET
 DATE: 6-25-91 JN: 03959

FILE: HS5AAC

MOVE 1995+ALL AM PEAK
 COMM ALT

1995+ALL PM PEAK
 COMM ALT

	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	4	1500	0.00	114	1500	0.08
NB THRU	25	1700	0.01 *	70	1700	0.04 *
NB RT	2	1500	0.00	67	1500	0.04
SB LT	108	1500	0.07 *	205	1500	0.14 *
SB THRU	27	1700	0.02	75	1700	0.04
SB RT	100	1500	0.07	136	1500	0.09
EB LT	121	1500	0.08 *	155	1500	0.10
EB THRU	466	3400	0.14	1135	3400	0.33 *
EB RT	10	1500	0.01	46	1500	0.03
WB LT	14	1500	0.01	95	1500	0.06 *
WB THRU	557	3400	0.20 *	733	3400	0.24
WB RT	127	0		80	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.47			0.67
LEVEL OF SERVICE			A			B

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959

FILE: GSFAEX

MOVE	EXISTING AM PEAK CONDITIONS			EXISTING PM PEAK CONDITIONS		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	58	1500	0.04 *	34	1500	0.02
NB THRU	389	3400	0.13	942	3400	0.29 *
NB RT	38	0		58	0	
SB LT	11	1500	0.01	72	1500	0.05 *
SB THRU	385	3400	0.13 *	790	3400	0.25
SB RT	41	0		51	0	
EB LT	42	0		52	0	
EB THRU	114	1700	0.14 *	197	1700	0.17 *
EB RT	90	0		40	0	
WB LT	41	0		34	0	
WB THRU	157	1700	0.13 *	165	1700	0.13 *
WB RT	25	0		30	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.54			0.75
LEVEL OF SERVICE			A			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GSFAPP

MOVE	1995+PH1 AM PEAK CONDITIONS			1995+PH1 PM PEAK CONDITIONS		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	77	1500	0.05 *	45	1500	0.03
NB THRU	489	3400	0.16	1185	3400	0.37 *
NB RT	43	0		65	0	
SB LT	14	1500	0.01	90	1500	0.06 *
SB THRU	485	3400	0.16 *	995	3400	0.31
SB RT	52	0		65	0	
EB LT	42	0		40	0	
EB THRU	116	1700	0.15 *	200	1700	0.17 *
EB RT	90	0		50	0	
WB LT	41	0		30	0	
WB THRU	157	1700	0.13 *	165	1700	0.14 *
WB RT	29	0		35	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.59			0.83
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GSFAHSC

MOVE	1995+PH1 AM PEAK +H ST ALT			1995+PH1 PM PEAK +H ST ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	77	1500	0.05 *	45	1500	0.03
NB THRU	489	3400	0.16	1185	3400	0.37 *
NB RT	43	0		65	0	
SB LT	14	1500	0.01	90	1500	0.06 *
SB THRU	485	3400	0.16 *	995	3400	0.31
SB RT	56	0		72	0	
EB LT	44	0		47	0	
EB THRU	116	1700	0.15 *	200	1700	0.17 *
EB RT	90	0		50	0	
WB LT	41	0		30	0	
WB THRU	157	1700	0.13 *	165	1700	0.14 *
WB RT	29	0		35	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.59			0.84
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FOURTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GSFAAC

MOVE	1995+ALL AM PEAK COMM ALT			1995+ALL PM PEAK COMM ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	77	1500	0.05 *	45	1500	0.03
NB THRU	489	3400	0.16	1185	3400	0.37 *
NB RT	43	0		65	0	
SB LT	14	1500	0.01	90	1500	0.06 *
SB THRU	485	3400	0.15 *	995	3400	0.32
SB RT	40	0		78	0	
EB LT	42	0		27	0	
EB THRU	116	1700	0.15 *	200	1700	0.16 *
EB RT	90	0		50	0	
WB LT	41	0		30	0	
WB THRU	157	1700	0.13 *	165	1700	0.14 *
WB RT	29	0		35	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.59			0.83
LEVEL OF SERVICE			A			D

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GS5AEX

MOVE	EXISTING AM PEAK CONDITION			EXISTING PM PEAK CONDITION		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	58	0		14	0	
NB THRU	71	1700	0.12 *	166	1700	0.16 *
NB RT	76	0		86	0	
SB LT	20	0		54	0	
SB THRU	87	1700	0.08 *	183	1700	0.17 *
SB RT	33	0		49	0	
EB LT	43	0		29	0	
EB THRU	143	1700	0.15 *	218	1700	0.16 *
EB RT	61	0		25	0	
WB LT	46	0		52	0	
WB THRU	187	1700	0.16 *	149	1700	0.14 *
WB RT	35	0		40	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.61			0.73
LEVEL OF SERVICE			B			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GS5APP

MOVE	1995+PH1 AM PEAK CONDITION			1995+PH1 PM PEAK CONDITION		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	62	0		15	0	
NB THRU	73	1700	0.13 *	170	1700	0.16 *
NB RT	80	0		90	0	
SB LT	22	0		60	0	
SB THRU	88	1700	0.08 *	185	1700	0.17 *
SB RT	34	0		50	0	
EB LT	45	0		30	0	
EB THRU	145	1700	0.15 *	220	1700	0.19 *
EB RT	61	0		75	0	
WB LT	46	0		50	0	
WB THRU	187	1700	0.16 *	150	1700	0.14 *
WB RT	35	0		40	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.62			0.77
LEVEL OF SERVICE			B			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GS5AHSC

MOVE	1995+PH1 AM PEAK +H ST ALT			1995+PH1 PM PEAK +H ST ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	64	0		22	0	
NB THRU	75	1700	0.13 *	178	1700	0.17 *
NB RT	82	0		97	0	
SB LT	22	0		60	0	
SB THRU	93	1700	0.09 *	193	1700	0.18 *
SB RT	34	0		50	0	
EB LT	45	0		30	0	
EB THRU	145	1700	0.15 *	220	1700	0.20 *
EB RT	65	0		82	0	
WB LT	50	0		57	0	
WB THRU	187	1700	0.16 *	150	1700	0.15 *
WB RT	35	0		40	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.63			0.79
LEVEL OF SERVICE			B			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

N/S STREET: FIFTH AVENUE
 E/W STREET: "G" STREET
 DATE: 6-25-91 JN: 03959 FILE: GS5AAC

MOVE	1995+ALL AM PEAK COMM ALT			1995+ALL PM PEAK COMM ALT		
	VOLUME	CAP	V/C RATIO	VOLUME	CAP	V/C RATIO
NB LT	62	0		13	0	
NB THRU	73	1700	0.13 *	157	1700	0.15 *
NB RT	80	0		78	0	
SB LT	22	0		60	0	
SB THRU	75	1700	0.08 *	199	1700	0.18 *
SB RT	34	0		50	0	
EB LT	45	0		30	0	
EB THRU	145	1700	0.14 *	220	1700	0.20 *
EB RT	49	0		88	0	
WB LT	34	0		63	0	
WB THRU	187	1700	0.15 *	150	1700	0.15 *
WB RT	35	0		40	0	
CLEARANCE			0.1			0.1
RT. TRN. COMPONENT			0			0
ICU			0.59			0.78
LEVEL OF SERVICE			A			C

LEVEL OF SERVICE RANGES

MAXIMUM SUM OF CRITICAL VOLUMES IN VPH

LEVEL OF SERVICE	TYPICAL V/C RATIO
A	0.00-0.60
B	0.61-0.70
C	0.71-0.80
D	0.81-0.90
E	0.91-1.00
F	>1.0

* CRITICAL MOVE

FIGURE
 WILLDAN ASSOCIATES

LOCATION:H STRE3T/MAIN DRIVEWAY

NAME:1995+PH 1+HSC

HOURLY VOLUMES

Major street:H STREET
 N
 v
 N= 2 <---V5--- 551
 Grade 657---V2---> v---V4--- 56
 0% 114---V3---v N= 3

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 62
 ---V3---v

Date of Counts: |<|>|
 NONE | V7 | V9 | X STOP
 Time Period: | | | YIELD
 AM PEAK HOUR | 0 | 25 |
 Approach Speed: Minor Street: Grade
 40 MPH MAIN DRIVE 0%
 PHF: .9 N= 1
 Population: 100000

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	657	114	56	551	0	25
Vol(pcp), see Table 10.1	XXXXXXXX	XXXXXXXX	62	XXXXXXXX	0	28

STEP 1 : RT From Minor Street | /-> V9
 Conflicting Flows, Vc | 1/2 V3+V2= 57 + 329 = 386 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 712 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 712 pcp

STEP 2 : LT From Major Street | v-- V4
 Conflicting Flows, Vc | V3+V2= 114 + 657 = 771 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 522 pcp (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 11.9% P4= .92
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 522 pcp

STEP 3 : LT From Minor Street | <- \ V7
 Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 | 57 + 657 + 551 + 56 = 1321 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 141 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 141 x .92 = 130 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	130	712	130	684	D	A
9	28	712	712	684	684	A	A
4	62	522		460		A	

LOCATION: "H" STREET/MAIN DRIVEWAY

NAME: 1995+ALL COMMERCIAL ALT

HOURLY VOLUMES

VOLUMES IN PCPH

Major street: H STREET
 N
 v
 N= 2 <---V5--- 1320
 Grade 741---V2---> v---V4--- 87
 0% 232---V3---v N= 3

<---V5---
 ---V2---> v---V4--- 96
 ---V3---v

Date of Counts: < | >
 NONE V7 V9 X STOP
 Time Period: YIELD
 PM PEAK HOUR 0 167
 Approach Speed: Minor Street: Grade
 40 MPH DRIVE 0%
 PHF: .9 N= 1
 Population: 1000000

< | >
 V7 V9
 0 184

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	741	232	87	1320	0	167
Vol(pcp). see Table 10.1	XXXXXXXX	XXXXXXXX	96	XXXXXXXX	0	184

STEP 1 : RT From Minor Street /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 116 + 371 = 487 vph(Vc9)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 722 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 722 pcp

STEP 2 : LT From Major Street v-- V4

Conflicting Flows, Vc | V3+V2= 232 + 741 = 973 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 405 pcp (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 23.7% P4= .83
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 405 pcp

STEP 3 : LT From Minor Street <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 116 + 741 + 1320 + 87 = 1700 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 85 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 85 x .83 = 71 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	71	722	71	538	E	A
9	184	722	722	538	538	A	A
4	96	405		309		B	

HOURLY VOLUMES

N>

VOLUMES IN PCPH

Major street:FIFTH

N= 1 <---V5--- 148
 Grade 224---V2---> v---V4--- 49
 0% 25---V3---v N= 2

<---V5---
 ---V2---> v---V4--- 54
 ---V3---v

Date of Counts: | < | | > |
 NONE | V7 | V9 | X STOP
 Time Period: | | | YIELD
 AM PEAK HOUR | 44 | 37 |
 Approach Speed: Minor Street: Grade
 30 MPH SO DRIVE 0%
 PHF: .9 N= 1
 Population: 100000

< | | > |
 V7 | V9 |
 48 | 41 |

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	224	25	49	148	44	37
Vol(pcp), see Table 10.1	XXXXXXX	XXXXXXX	54	XXXXXXX	48	41

STEP 1 : RT From Minor Street | /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 13 + 224 = 237 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 851 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 851 pcph

STEP 2 : LT From Major Street | v-- V4

Conflicting Flows, Vc | V3+V2= 25 + 224 = 249 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 933 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 5.8% P4= .97
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 933 pcph

STEP 3 : LT From Minor Street | <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 13 + 224 + 148 + 49 = 434 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 536 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 536 x .97 = 520 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	48	520	634	472	545	A	A
9	41	851	634	810	545	A	A
4	54	933		879		A	

LOCATION: FIFTH AVE/SOUTH DRIVEWAY

NAME: 1995+ALL COMMERCIAL ALT

HOURLY VOLUMES

N>

Major street: FIFTH

N= 1 <---V5--- 249
 Grade 218---V2---> v---V4--- 88
 0% 44---V3---v N= 2

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 97
 ---V3---v

Date of Counts: <| |>
 NONE V7 V9 X STOP
 Time Period: YIELD
 PM PEAK HOUR 84 73
 Approach Speed: Minor Street: Grade
 30 MPH SO DRIVE 0%
 PHF: .9 N= 1
 Population: 100000

<| |>
 V7 V9
 92 80

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	218	44	88	249	84	73
Vol(pcp), see Table 10.1	XXXXXXXX	XXXXXXXX	97	XXXXXXXX	92	80

STEP 1 : RT From Minor Street /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 22 + 218 = 240 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 848 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 848 pcp

STEP 2 : LT From Major Street v-- V4

Conflicting Flows, Vc | V3+V2= 44 + 218 = 262 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 921 pcp (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 10.5% P4= .94
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 921 pcp

STEP 3 : LT From Minor Street <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 22 + 218 + 249 + 88 = 577 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 436 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 436 x .94 = 410 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	92	410	540	318	368	B	B
9	80	848	540	768	368	A	B
4	97	921		824		A	

LOCATION:FIFTH AVE/NO DRIVEWAY

NAME:1995+ALL COMMERCIAL ALT

HOURLY VOLUMES

N>

Major street:FIFTH

N= 1 <---V5--- 148
 Grade 224---V2---> v---V4--- 49
 0% 24---V3---v N= 2

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 54
 ---V3---v

Date of Counts: < | | >
 NONE V7 V9 X STOP
 Time Period: YIELD
 AM PEAK HOUR 43 38
 Approach Speed: Minor Street: Grade
 30 MPH SO DRIVE 0%
 PHF: .9 N= 1
 Population: 100000

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	224	24	49	148	43	38
Vol(pcpH).see Table 10.1	XXXXXXXX	XXXXXXXX	54	XXXXXXXX	47	42

STEP 1 : RT From Minor Street /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 12 + 224 = 236 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 852 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 852 pcph

STEP 2 : LT From Major Street v-- V4

Conflicting Flows, Vc | V3+V2= 24 + 224 = 248 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 934 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 5.8% P4= .97
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 934 pcph

STEP 3 : LT From Minor Street <- \ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 12 + 224 + 148 + 49 = 433 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 537 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 537 x .97 = 521 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	47	521	638	474	549	A	A
9	42	852	638	810	549	A	A
4	54	934		880		A	

LOCATION: FIFTH AVE/NO DRIVEWAY

NAME: 1995+ALL COMMERCIAL ALT

HOURLY VOLUMES

Major street: FIFTH
 N= 1
 Grade 218---V2---> <---V5--- 249
 0% 43---V3---v v---V4--- 88
 N= 2
 Date of Counts: < | >
 NONE V7 V9 X STOP
 Time Period: YIELD
 PM PEAK HOUR 83 72
 Approach Speed: Minor Street: Grade
 30 MPH SO DRIVE 0%
 PHF: .9 N= 1
 Population: 100000

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 97
 ---V3---v
 < | >
 V7 V9
 91 79

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	218	43	88	249	83	72
Vol(pcph). see Table 10.1	XXXXXXX	XXXXXXX	97	XXXXXXX	91	79

STEP 1 : RT From Minor Street /-> V9

Conflicting Flows, Vc 1/2 V3+V2= 22 + 218 = 240 vph(Vc9)
 Critical Gap, Tc Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp Cp9= 848 pcph (Fig.10.3)
 Actual Capacity, Cm Cm9=Cp9= 848 pcph

STEP 2 : LT From Major Street v-- V4

Conflicting Flows, Vc V3+V2= 43 + 218 = 261 vph(Vc4)
 Critical Gap, Tc Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp Cp4= 922 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor (V4/Cp4)x100= 10.5% P4= .94
 Actual Capacity, Cm (Fig.10.5) Cm4=Cp4= 922 pcph

STEP 3 : LT From Minor Street <- \ V7

Conflicting Flows, Vc 1/2 V3+V2+V5+V4=
 22 + 218 + 249 + 88 = 577 vph(Vc7)
 Critical Gap, Tc Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp Cp7= 436 pcph (Fig.10.3)
 Actual Capacity, Cm Cm7=Cp7xP4= 436 x .94 = 410 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	91	410	539	319	369	B	B
9	79	848	539	769	369	A	B
4	97	922		825		A	

HOURLY VOLUMES

Major street:FIFTH AVE
 N= 1
 Grade 258---V2---> <---V5--- 436
 0% 47---V3---v v---V4--- 89
 N= 2

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 98
 ---V3---v

Date of Counts: <| |>
 NONE V7 V9 X STOP
 Time Period: YIELD
 PM PEAK HOUR 163 132
 Approach Speed: Minor Street: Grade
 30 MPH DRIVEWAY 0%
 PHF: .9 N= 1
 Population: 100000

<| |>
 V7 V9
 179 145

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	258	47	89	436	163	132
Vol(pcp).see Table 10.1	XXXXXXXX	XXXXXXXX	98	XXXXXXXX	179	145

STEP 1 : RT From Minor Street /-> V9
 Conflicting Flows, Vc | 1/2 V3+V2= 24 + 258 = 282 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 804 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 804 pcp

STEP 2 : LT From Major Street v-- V4
 Conflicting Flows, Vc | V3+V2= 47 + 258 = 305 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 881 pcp (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 11.1% P4= .93
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 881 pcp

STEP 3 : LT From Minor Street <-\ V7
 Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 24 + 258 + 436 + 89 = 807 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 307 pcp (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 307 x .93 = 286 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	179	286	402	107	78	D	E
9	145	804	402	659	78	A	E
4	98	881		783		A	

LOCATION:H STREET/MIAN DRIVEWAY

NAME:1995+ALL COMMERCIAL ALT

HOURLY VOLUMES

Major street:H STREET
 N
 v
 N= 2 <---V5--- 527
 Grade 611---V2---> v---V4--- 49
 0% 130---V3---v N= 3
 Date of Counts: <| > X STOP
 NONE V7 V9 YIELD
 Time Period: 0 87
 AM PEAK HOUR
 Approach Speed: Minor Street: Grade
 40 MPH DRIVE 0%
 PHF: .9 N= 1
 Population: 1000000

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 54
 ---V3---v
 <| >
 V7 V9
 0 96

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	611	130	49	527	0	87
Vol(pcph), see Table 10.1	XXXXXXX	XXXXXXX	54	XXXXXXX	0	96

STEP 1 : RT From Minor Street

/-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 65 + 306 = 371 vph(Vc9)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 825 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 825 pcph

STEP 2 : LT From Major Street

v-- V4

Conflicting Flows, Vc | V3+V2= 130 + 611 = 741 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 540 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 10% P4= .94
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 540 pcph

STEP 3 : LT From Minor Street

<- \ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 65 + 611 + 527 + 49 = 1252 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 157 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 157 x .94 = 148 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	148	825	148	729	D	A
9	96	825	825	729	729	A	A
4	54	540		486		A	

LOCATION:H STREET/MAIN DRIVEWAY

NAME:1995+PH 1+HSC

HOURLY VOLUMES

Major street:H STREET N
v

N= 2 <---V5--- 1389
Grade 798---V2---> v---V4--- 45
0% 62---V3---v N= 3

=====
Date of Counts: < | > =====
NONE V7 V9 X STOP
Time Period: YIELD
PM PEAK HOUR 0 127
Approach Speed: Minor Street: Grade
40 MPH MAIN DRIVE 0%
PHF: .9 N= 1
Population: 100000

VOLUMES IN PCPH

=====
<---V5---
---V2---> v---V4--- 50
---V3---v
=====
< | > =====
V7 V9
0 140

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	798	62	45	1389	0	127
Vol(pcp), see Table 10.1	XXXXXXX	XXXXXXX	50	XXXXXXX	0	140

STEP 1 : RT From Minor Street

/-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 31 + 399 = 430 vph(Vc9)
Critical Gap, Tc | Tc= .5.5 secs (Tab.10.2)
Potential Capacity, Cp | Cp9= 678 pcp (Fig.10.3)
Actual Capacity, Cm | Cm9=Cp9= 678 pcp

STEP 2 : LT From Major Street

v-- V4

Conflicting Flows, Vc | V3+V2= 62 + 798 = 860 vph(Vc4)
Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
Potential Capacity, Cp | Cp4= 469 pcp (Fig.10.3)
% of Cp utilized and Impedance Factor | (V4/Cp4)x100= 10.7% P4= .93
Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 469 pcp

STEP 3 : LT From Minor Street

<-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
31 + 798 + 1389 + 45 = 1700 vph(Vc7)
Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
Potential Capacity, Cp | Cp7= 85 pcp (Fig.10.3)
Actual Capacity, Cm | Cm7=Cp7xP4= 85 x .93 = 79 pcp

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	79	678	79	538	E	A
9	140	678	678	538	538	A	A
4	50	469		419		A	

LOCATION:H STREET/ARBY'S DRIVEWAY

NAME:1995+PH 1+HSC

HOURLY VOLUMES

VOLUMES IN PCPH

Major street:H STREET
 N
 v
 N= 2 <---V5--- 551
 Grade 682---V2---> v---V4--- 0
 0% 46---V3---v N= 2
 Date of Counts: <| |>
 NONE V7 V9 X STOP
 Time Period: YIELD
 AM PEAK HOUR 0 36
 Approach Speed: Minor Street: Grade
 40 MPH ARBY'S DR 0%
 PHF: .9 N= 1
 Population: 100000

<---V5---
 ---V2---> v---V4--- 0
 ---V3---v
 <| |>
 V7 V9
 0 40

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	682	46	0	551	0	36
Vol(PCPH), see Table 10.1	XXXXXXXX	XXXXXXXX	0	XXXXXXXX	0	40

STEP 1 : RT From Minor Street /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 23 + 341 = 364 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 731 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 731 pcph

STEP 2 : LT From Major Street v-- V4

Conflicting Flows, Vc | V3+V2= 46 + 682 = 728 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 548 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 0% P4= 1
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 548 pcph

STEP 3 : LT From Minor Street <- \ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 23 + 682 + 551 + 0 = 1256 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 156 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 156 x 1 = 156 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	Cm(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	156	731	156	691	D	A
9	40	731	731	691	691	A	A
4	0	548		548		A	

LOCATION:H STREET/AREY'S DRIVEWAY

NAME:1995+PH 1+HSC

HOURLY VOLUMES

VOLUMES IN PCPH

Major street:H STREET
 N
 v
 N= 2 <---V5--- 1389
 Grade 925---V2---> v---V4--- 0
 0% 76---V3---v N= 2
 Date of Counts: <| |>
 NONE V7 V9 X STOP
 Time Period: YIELD
 PM PEAK HOUR 0 89
 Approach Speed: Minor Street: Grade
 40 MPH AREY'S DR 0%
 PHF: .9 N= 1
 Population: 100000

<---V5---
 ---V2---> v---V4--- 0
 ---V3---v
 <| |>
 V7 V9
 0 98

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	925	76	0	1389	0	89
Vol(pcph), see Table 10.1	XXXXXXXX	XXXXXXXX	0	XXXXXXXX	0	98

STEP 1 : RT From Minor Street /-> V9
 Conflicting Flows, Vc | 1/2 V3+V2= 38 + 463 = 501 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 624 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 624 pcph

STEP 2 : LT From Major Street v-- V4
 Conflicting Flows, Vc | V3+V2= 76 + 925 = 1001 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 390 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 0% P4= 1
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 390 pcph

STEP 3 : LT From Minor Street <-\ V7
 Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 | 38 + 925 + 1389 + 0 = 1700 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 85 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 85 x 1 = 85 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	0	85	624	85	526	E	A
9	98	624	624	526	526	A	A
4	0	390		390		B	

HOURLY VOLUMES

N>

Major street: FIFTH AVE

N= 1 <---V5--- 85
 Grade 231---V2---> v---V4--- 112
 0% 61---V3---v N= 2

VOLUMES IN PCPH

<---V5---
 ---V2---> v---V4--- 123
 ---V3---v

Date of Counts: < | >
 NCNE V7 V9 X STOP
 Time Period: YIELD
 AM PEAK HOUR 37 30
 Approach Speed: Minor Street: Grade
 30 MPH DRIVEWAY 0%
 PHF: .9 N= 1
 Population: 100000

< | >
 V7 V9
 41 33

VOLUME ADJUSTMENTS

Movement no.	2	3	4	5	7	9
Volume (vph)	231	61	112	85	37	30
Vol(pcp), see Table 10.1	XXXXXXX	XXXXXXX	123	XXXXXXX	41	33

STEP 1 : RT From Minor Street | /-> V9

Conflicting Flows, Vc | 1/2 V3+V2= 31 + 231 = 262 vph(Vc9)
 Critical Gap, Tc | Tc= 5.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp9= 825 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm9=Cp9= 825 pcph

STEP 2 : LT From Major Street | v-- V4

Conflicting Flows, Vc | V3+V2= 61 + 231 = 292 vph(Vc4)
 Critical Gap, Tc | Tc= 5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp4= 893 pcph (Fig.10.3)
 % of Cp utilized and Impedance Factor | (V4/Cp4)x100= 13.8% P4= .91
 Actual Capacity, Cm (Fig.10.5) | Cm4=Cp4= 893 pcph

STEP 3 : LT From Minor Street | <-\ V7

Conflicting Flows, Vc | 1/2 V3+V2+V5+V4=
 31 + 231 + 85 + 112 = 459 vph(Vc7)
 Critical Gap, Tc | Tc= 6.5 secs (Tab.10.2)
 Potential Capacity, Cp | Cp7= 519 pcph (Fig.10.3)
 Actual Capacity, Cm | Cm7=Cp7xP4= 519 x .91 = 472 pcph

SHARED LANE CAPACITY SH = (V7+V9)/((V7/Cm7)+(V9/Cm9)) if lane is shared

MOVEMENT	V(PCPH)	CM(PCPH)	CSH(PCPH)	CR (CM-V)	CR (CSH-V)	LOS CM	LOS CSH
7	41	472	583	431	509	A	A
9	33	825	583	792	509	A	A
4	123	893		770		A	

APPENDIX C
NOISE ANALYSIS



SAN DIEGO ACOUSTICS, Inc.

Report No. 90-024

July 19, 1990

**Environmental Noise Analysis
Scripps Memorial Hospital Expansion
for JBF & Associates**

Introduction

This study was conducted to show the acoustic suitability of the proposed project with respect to the requirements of the City of Chula Vista Department of Planning and Land Use.

The subject expansion is located in a commercial development that is bordered on the west by Fifth Avenue, on the south by H Street and on the east by Fourth Street. The planned expansion will be bordered on the north by the Chula Vista Junior High School.

Phase 1 of the expansion will consist of an additional 3 story hospital building, a 5 story medical office building and a 352 space parking lot and several smaller parking areas.

The Ultimate Phase will include another 3 story hospital expansion, another 5 story addition to the medical office building and a 5 level parking structure in the location of the 352 parking space lot.

Approximately 7 commercial endeavors will be displaced by the proposed expansion.

Existing Noise Levels

Existing noise levels were measured as a function of automotive traffic on Fifth Avenue and on H Street. Measurements were made on May 9, 1990, between the hours of 10 and 11 A.M.

Noise levels were measured using a Bruel and Kjaer sound level meter Type 2230. This precision instrument fulfills IEC 804 Type 1 and ANSI S1.4.1971 Type 1 requirements. It provides measurement of L_{eq} , L_{max} , L_{min} as well as the current sound level.

Passing vehicles were counted simultaneously with the noise measurement so that an adjustment could be made if the passing traffic varied from the average noted by the City.

The measured data are shown in Table 1.

Table 1.

Noise Levels Measured Between 4th and 5th Streets On H Street
and Between H and G Streets On 5th Street.

Street	L_{eq}	L_{max}	L_{min}	H.T.	Veh/Hr.
"H" Street	68	82	55	4%	1508
Fifth Street	64	78	48	0%	382

Note: Distance microphone from center of street; "H" Street, 61 feet; Fifth Street, 30 feet.

Willdan (traffic consultant for the project) notes that the current volumes for the two streets are 30,100 and 5,700 ADT, respectively.

A ratios established in the Wyle Noise Model relate off peak daytime hourly traffic volumes to the Average Daily Traffic (ADT). Using this ratio and the hourly vehicle counts noted during the data measurement period, it is possible to obtain an estimate of the ADT present at the time noise levels were measured and make an adjustment if the traffic volume was different from the accepted average traffic volume. In addition, this same Wyle Model notes that the value of Leq resulting during daytime off peak hours is approximately 2 dB less than the 24 hour average, CNEL.

Correcting for the Willdan values of traffic and converting the values to CNEL, results in the establishment of noise levels associated with the average traffic volumes, upon which the location of the CNEL contours can be based. The location of these contours are contained in Table 2. (Note that present contours for "G" Street are also identified. These contours are based on the Fifth Street measurements and the traffic volume of 6,100 ADt established by Willdan. As the operating characteristics are similar for vehicles traveling on "G" and Fifth Street, this is a reasonable extension of the data.

Table 2
Location of Noise Contours On 5th Avenue and "G" and "H"
Streets.

Street	<u>Distance of Contour From Center of Street - Ft.</u>			
	Contour - CNEL	70	65	60
"H"	70'	221'	699'	
Fifth	*	33'	104'	
"G"	*	35'	112'	

Note: * - indicates noise contour located within the street.
Contours for "G" and "H" Streets are applicable between

Fourth and Fifth Streets. Contours for Fifth Street are applicable between "G" and "H" Streets.

Noise levels resulting from stationary sources attached to the current commercial establishments were not identified as the traffic noise established the existing ambient level in the neighborhood.

Future Levels

The future noise levels will result from changes in street traffic, parking facility noise and a potential from stationary HVAC and standby power sources for the hospital.

Street Traffic

Traffic noise levels were calculated on the basis of predicted volumes (Willdan) at "build out" resulting from the project and all other outside factors.

Willdan provided the "present" and "build out" traffic volumes shown in Table 3.

Table 3
Present and Build Out Traffic Volumes For Project Streets.

Street		Average Daily Trips - ADT		
		Present	At Build Out due to:	
			Community	Community+Project
Fifth	N*	5,700	7,400	9,500
	S*	5,700	5,300	10,100
	"H"	30,100	37,000	39,700
	"G"	6,100	3,100	4,000

Note: N* or S* means, north or south of the project.

Changes in traffic volume result in changes in traffic noise as a function of the relationship $10 \log(T_1/T_2)$. Where T_1 and T_2 represent the original traffic volume (ADT) and the new traffic volume. Thus, the future noise levels will increase adjacent to Fifth and "H" Streets and decrease on "G" Street. (Note that the decrease of noise on "G" Street does not result from the affect of the project but from a reduction in traffic caused by other factors.)

Between "G" and "H" Streets, on Fifth, noise levels will increase by 2.2 and 2.5 dB to the north and to the south of the project, respectively. Between Fourth and Fifth Streets the noise level will increase by 1.2 dB on "H" Street and decrease by 1.8 dB on "G" Street.

The changes in the locations of the noise contours, at "build out" are shown in Table 4.

Table 4
Location of Noise Contours On 5th Avenue and "G" and "H"
Streets At Build Out.

Street	<u>Distance of Contour From Center of Street - Ft.</u>			
	Contour - CNEL	70	65	60
"H"		92 (70)	292 (221)	923 (699)
Fifth N. of project	*	55 (33)	173 (104)	
S. of project		58 (33)	185 (104)	
"G"	*	23 (35)	74 (112)	

Note: Values inside brackets () are present contour locations.

* - indicates noise contour located within the street.

Contours for "G" and "H" Streets are applicable between Fourth and Fifth Streets. Contours for Fifth Street are applicable between "G" and "H" Streets.

Parking Facility

The primary parking for the project will occur in a space immediately adjacent to Fifth Street. An initial at grade parking lot will be built to handle approximately 352 vehicles. The second phase of construction will replace this lot with a 5 level parking garage of 775 spaces (one level will be below ground). Only the latter facility was analyzed as the volume of traffic will be much greater with a much higher potential for noise and an additional, closer, Junior High School building will likely be in existence at that time.

The parking garage was analyzed on the basis of peak hour traffic movement and the assumption that all four sides of the structure would be essentially "open". In addition, a staff and service road will exist to the north of the garage, south of the Chula Vista Junior High School property. The affect of this traffic was also taken into account. The distance from the parking garage to the face of the new school building will be 57 feet. The distance from the center of the service road to the face of the future school building will be 31 feet.

The analysis is based on the fact that an average automobile traveling at low speed (6 mph) produces a peak noise level of 70 dB(A) while passing at a distance of 10 feet. Conservatively, a passing vehicle would produce a single event level (SEL) of 78.3 dB(A). This value of SEL and the Willdan estimate of 328 vehicles in and 751 vehicles out (of these 228 vehicle would use the service road to the north) during the maximum P.M. peak hour was used to determine the maximum hourly noise which would reach the face of the nearest building, the Junior High School.

The total effect of the parking garage peak hour noise will be a level of 69 L_{eq} , at the face of the future classroom building. Of this level 61 dB would be contributed

by vehicles using the service road, 65 dB from the 1st floor, 62 dB from the 2nd floor, 60 from the 3rd floor and 54 dB from the 4th floor. Basement parking influence was assumed to be nil as it was assumed that this level would not be open on any side.

The subject of emergency vehicles was examined. Approximately 10 emergency trips per day are expected. Of these trips only one per day is expected to use the siren. In any case the siren will not be used "on the property". Three entry points are available and an equal use of each is expected. As only one "siren trip" per day is expected it will not appreciably add to the average hourly noise level and was not included in the calculations for any street.

HVAC And Standby Power

HVAC units will be located on the roof of the new buildings. It will be at least 220 feet from the nearest unit location to the nearest property line to the north. Noise levels from such units depend upon the size, type and manufacturer. None of this information has been defined at this time. Another planned hospital will utilize air handlers and return air units in the range of 7 to 10 H.P. and 10,000 to 20,000 CFM. Two air handlers and two return fans, of this type, will produce 92 PWL dB(A), or at a distance of 220 feet will result in a sound pressure level of 48 dB(A). Ten such pairs would produce 55 dB(A) at 220 feet.

The emergency power source will be two 600 KW generators driven by a diesel engine. Again, these items have not been further defined. 1200 KW would require an input of at least 1600 HP (100% efficiency). A 400 HP diesel engine produces approximately 83 dB(A) at a distance of 50 feet. Four would produce 89 dB(A) at the same distance. At 220 feet to the property line the noise level would be 76 dB(A).

The major power transformer has not been defined but a typical size might be 12 KVA at 480 volts. Such a transformer might produce a level of 68 dB(A) at a distance of 1 meter. This might be disturbing if it were located on the property line.

Mitigation

The Chula Vista Planning Department restricts the land use as a function of the exterior noise. Hospitals are usually limited to areas of 65 CNEL, or less. However, this is an expansion of an existing facility and no outdoor patient areas are planned. Thus, if interior noise limits can be met no exterior limits should be required. However, the project must adhere to the City Noise Code which restricts hourly noise levels that can be produced at the property line.

The Chula Vista City Code places limits upon the originator of noise as a function the adjoining land use category. These categories include residential, commercial and industrial uses. The only directly adjacent neighbor (to the north) is the Chula Vista Junior High School. Schools are not covered by C.V. Noise Ordinance.

As an explicit criteria does not exist, a logical reference criteria was sought and selected. The State of California has set a limit on traffic noise permitted for elementary and secondary schools, Section 216 of the Streets and Highways Code. In essence this Code limits the noise which may be produced inside a classroom to 55 dB(A) L_{10} or 52 dB(A) L_{eq} . L_{10} refers to the level which is exceeded 10% of the time. This usually means the peak hour level. It is also generally considered that the exterior sound level is reduced by 10 dB when it arrives through an open window. Thus, a reasonable limit for peak hour noise outside the window of a school room can be 65 dB(A). This limit is used as the criteria for this project with respect to the neighbor school.

The parking garage generating 69 dB(A) has been shown to exceed the selected hourly criteria. This level would be reduced to about 61 or 62 dB(A) if the northern facing wall of the garage was solid, on all levels, ie no openings to the north.

The remaining HVAC and standby power equipment should be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The planned enclosure for the standby power unit

may provide the necessary noise reduction depending upon the details of construction.

An interior noise analysis will have to be made to assure that the interior noise limits will not be exceeded. Detailed plans must be available to make this analysis.

Summary

The expected future noise levels at the site should not restrict the expansion of this hospital facility.

Future traffic noise will increase by 2.2 to 2.5 dB on Fifth Street, 1 dB on "H" Street and decrease by 2 dB on "G" Street. The project is only partially responsible for these changes.

Potential sources of project noise have been identified but cannot be predicted at this point. These sources should be made to be in compliance with the Chula Vista Noise Ordinance.



E. C. Kamps

Consultant in Acoustics

for San Diego Acoustics, Inc.

Senate Bill No. 290

CHAPTER 707

An act to amend Section 216 of the Streets and Highways Code, relating to state highways.

[Approved by Governor September 9, 1983. Filed with Secretary of State September 11, 1983.]

LEGISLATIVE COUNSEL'S DIGEST

SB 290, Ellis. State highways: noise abatement programs.

Under existing law, the Department of Transportation is required to measure noise levels and undertake noise abatement programs in specified schools along state freeways.

This bill would revise the decibel scale to be used by the department for measurement of noise levels in the schools and for qualification for the noise abatement programs.

The people of the State of California do enact as follows:

SECTION 1. Section 216 of the Streets and Highways Code is amended to read:

216. The noise level produced by the traffic on, or by the construction of, a state freeway shall be measured in the classrooms, libraries, multipurpose rooms, and spaces used for pupil personnel services of a public or private elementary or secondary school if the rooms or spaces (a) were constructed prior to the award of the initial construction contract for the freeway route and prior to January 1, 1974, or (b) were constructed after December 31, 1973, and were constructed prior to the issuance of a statement of present and projected noise levels of the freeway route by the department pursuant to subdivision (g) of Section 65302 of the Government Code, and (c) are being used for the purpose for which they were constructed.

The measurements shall be made at appropriate times during regular school hours and shall not include noise from sources that exceed the maximum permitted by law.

If the noise level produced from the freeway traffic, or the construction of the freeway, exceeds 55dBA, L10, or 52dBA, Leq., the department shall undertake a noise abatement program in any such classroom, library, multipurpose room, or space used for pupil personnel services to reduce the freeway traffic noise level therein to 55dBA, L10, or 52dBA, Leq., or less, by, but not limited to, installing acoustical materials, eliminating windows, installing air conditioning, or constructing sound baffle structures.

If the department determines that the construction of the freeway will result in a noise level exceeding 55dBA, L10, or 52dBA, Leq., the

department shall complete the temporary or permanent noise abatement program prior to commencing such construction, or as soon as practicable thereafter.

If it becomes necessary to convert the classrooms, libraries, multipurpose rooms, or spaces used for pupil personnel services to other school-related purposes because the freeway traffic noise level therein exceeds 55dBA, L10, or 52dBA, Leq., the department shall pay the cost of the conversions.

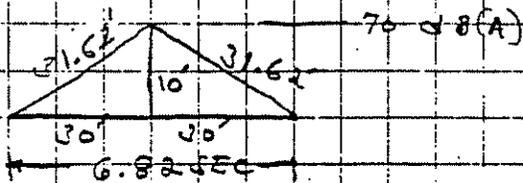
If the noise level generated from sources within and without the classrooms, libraries, multipurpose rooms, or spaces used for pupil personnel services exceeds 55dBA, L10, or 52dBA, Leq. prior to construction of the freeway and the noise from the freeway, or the construction thereof, also exceeds 55dBA, L10, or 52dBA, Leq., the department shall be required to undertake a noise abatement program that will reduce the noise to its preconstruction level.

Priority for noise abatement programs shall be given to those public and private elementary and secondary classrooms, libraries, multipurpose rooms, and spaces used for pupil personnel services constructed in conformance with Article 3 (commencing with Section 39140) of Chapter 2 of Part 23 of Division 3 of Title 2 of the Education Code.

As used in this section, dBA means decibels measured by the "A" weighting described in Section 3.1 of the American National Standard specification for sound level meters, S1.4-1971, approved April 27, 1971, and published by the American National Standards Institute. L10 is the sound level that is exceeded 10 percent of the time for the period under consideration and is a value which is an indicator of both the magnitude and frequency of occurrence of the loudest noise events. Leq. is the equivalent steady state sound which in a stated period of time would contain the same acoustic energy as the time-varying sound level during the same time period.

ASSUME

AVE SPEED IN GARAGE OR SWTRY IS 5 MPH (8.8 FT/SEC)
 MAX PASSING NOISE LEVEL IS 70 dBA AT 10 FT



$$\log / \text{HR} = 10 \log \left\{ \frac{\text{INV. LOG.} \left(\frac{70 \text{ dBA} - 20 \log \frac{D}{10'}}{10} \right)}{3600 \text{ SEC}} \times \left(\frac{\text{TIME TO PASS}}{\text{DWT. AVE.}} \right) \times \left(\frac{\text{No. VEH}}{\text{HR}} \right) \right\}$$

* SPL OF CAR LEAVING GARAGE AT NORTH END, AT FACE OF C.V.J.H.S. (14' + 17' = 31' CTR OF ROADWAY TO FACE OF BUILDING)

PEAK PM HOUR

$$\log / \text{HR} = 10 \log \left\{ \frac{\text{INV. LOG.} \left(70 - 20 \log \frac{31}{10} \right)}{3600} \times 6.82 \times \frac{31}{10} \times 227 \right\} = 61.4$$

* SPL OF CAR INSIDE GARAGE. ALL ENTRANCES, 4 LEVELS, NORTH END OF GARAGE (57' FROM FACE OF C.V.J.H.S.)

PEAK PM HOUR (1079 VEH MOVING), 125' FROM CENTER OF GARAGE TO NORTH EDGE (124' + 1' = 125' CTR TO C.V.J.H.S.)

	PARK CIRCLE	ACTUAL (1079 MOVING)	Σ RATIO'S TO 1079 MOVING
4TH	150	(0) 150	216
3RD	150 + 150	(216) 300	432
2ND	150 + 150 + 150	(432) 450	648
1ST	150 + 150 + 150 + 150 + 150 (864)	(720) 720	1079
BASE	150	150	216

ASSUME ENTRY ON 4TH AVE CIRCLE FLOOR UP TO NEXT CIRCLE, ETC.

CHERT CONTINUED = CIRCLING EFFECT IN GARAGE

P.M.
MAY
HR.
M
D
D
E
L

J.G.M.: PASS BY AT 91 FEET (PARALLEL TO SCHOOL)
EACH " BY AT 151 "
FLOOR 211 "
+ 271 "

54 VEH
54 VEH
54 VEH
54 VEH

DISTANCE	FLOOR	NUMBER OF CARS BASED ON	2ND	2ND	1ST
9.1		0	216	432	864
27.1		0	216	432	864
(-6dB FROM 9.1') (for 40.8 sec)		0	216	432	864

1ST FLOOR:
$$L_{dB}/HR = 10 \log \left[\frac{164 \log \left(\frac{70 - 20 \log \frac{91}{10}}{10} \right)}{3600} \right] \times 6.82 \times \frac{91}{10} \times 54 = 50.5$$

PARKING
VEH

$$\frac{151}{10} \times \frac{54}{10} = 48.2$$

$$\frac{211}{10} \times \frac{54}{10} = 46.9$$

$$\frac{271}{10} \times \frac{54}{10} = 45.8$$

1ST FLOOR
CIRCLING
VEH

$$L_{dB}/HR = 10 \log \left[\frac{164 \log \left(\frac{70 - 20 \log \frac{91}{10}}{10} \right)}{3600} \right] \times 6.82 \times \frac{91}{10} \times 864 = 62.5$$

$$\frac{271}{10} \times \frac{864}{10} = 57.8$$

44.8 dB AT 40.8 sec FOR 864 VEH

$$10 \log \left[\frac{164 \log \left(\frac{44.8}{10} \right)}{3600} \right] \times 40.8 \times 864 = 54.7$$

54.7

2ND FLOOR:

PARKING
VEH

$$Leq/HR = 10 \cdot \text{LOG} \left\{ \frac{10 \cdot \text{INV LOG} \left(\frac{70 - 20 \text{ LOG } \frac{91}{10}}{10} \right)}{3600} \right\} \times 6.82 \times \frac{91}{10} \times 432 = 40.5$$

48.3

46.9

45.8

2ND FLOOR
CIRCLING
VEH

$$Leq/HR = 10 \cdot \text{LOG} \left\{ \frac{10 \cdot \text{INV LOG} \left(\frac{70 - 20 \text{ LOG } \frac{91}{10}}{10} \right)}{3600} \right\} \times 6.82 \times \frac{91}{10} \times 432 = 59.5$$

$$\frac{271}{10} \times \frac{271}{10} \times 432 = 54.8$$

44.8 dB AT 40.8 SEC FOR 432 VEH

$$10 \cdot \text{LOG} \left\{ \frac{10 \cdot \text{INV LOG} \left(\frac{44.8}{10} \right) \times 40.8 \times 432}{3600} \right\} = 51.7$$

62.1

3RD FLOOR

PARKING
VEH

54.3 }
= 40.5
= 48.3
= 46.9
= 45.8

CIRCLING
VEH

= 56.5
= 51.8
= 48.7
59.7

4TH FLOOR

PARKING
VEH
ONLY

40.5
48.3
46.9
45.8
54.2

TOTAL OF ALL FLOORS

1ST
2ND
3RD
4TH

69.7
62.1
59.7
54.3



67.6
+ 61.4
129.0

EQUIPMENT NOISE

EMERGENCY POWER GENERATOR - 2 600 KW (89) DIESEL POWER

$$\frac{600 + 600 \text{ KW}}{1 \text{ KW}} \times 1.341 \text{ HP} = 1609 \text{ HP}$$

1 - 400 HP

83 dBA at 50'
86 for 2
89 for 4

746 watts = 1 HP

746 kW = 1000 HP

$89 - 20 \log \frac{220}{50} = 76 \text{ dB(A) SPL at P.L.}$ ★
enclose muffler etc. - design for own good.

POWER TRANSFORMER - IN ELECT. EQUIP. YARD = 4 SOLID WALLS WITH

Typical P_r

10 KVA transformer 480V = 68 dB(A) at 1 meter

LOWERED CEILING / ROOF
RAFFLE



A/C UNIT NOTED ON PLANS

R.F. 7' INTAKE 10HP 20K CFM AIR HANDLER P.W.L. = 90 SPL_r = 70 dB(A)

A.H. 4' INTAKE 10HP 9K CFM AIR HANDLER P.W.L. = 87 SPL_r = 67 dB(A)

2 RD. P.L. TO MECH HVAC ON ROOF

FREE FIELD

2 A.H. + 2 R.F. ⇒ 92 P.W.L. dB(A) OR $SPL = P.W.L. - 20 \log r + 2.3$ dB(A)
 at 220 FEET $SPL = 92 - 20 \log 220 + 2.3 = 47.5$ dB(A)

★ 10 UNITS = $47.5 + 10 \log \frac{10}{2} = 57 \text{ dB(A)}$ low directivity due to facing inlets & exhausts toward H street.

STREET NOISE

450-5840

	OTH(N)	VEH(Q)	H	H.T.H.	G
AT PRESENT	5,700	5,700	30,100	25,700	6,100
PHASE					
ULTIMATE	9,000	10,100	39,700	29,400	4,000
	* + 2.2dB	* + 2.5dB	* + 1.2dB	* 0.0dB	* - 1.8dB

"H" ST. MEASUREMENT AT 61' FROM

68 Log (FOR 26,000 VEH, 4% H.T.) = 70 CNEL = 70.6 CNEL
AT 30,100 ADT AT 61 TO

WILL DAN SAY EXISTING N. 30,100 ADT Δ + 0.6 dB
 " " " FUTURE + PROJECT = 39,700 Δ + 1.2 dB

DISTANCE TO:	PRESENT	PRESENT + PROJ
* 70 CNEL	70'	92'
* 60 CNEL	221'	292'

5TH AVE. MEASUREMENT AT 30' FROM

64 Log (FOR 6600 ADT, 0% H.T.) = 66 CNEL = 65.4 CNEL
AT 5,700 ADT AT 30' TO

WILL DAN SAY EXISTING N. 5,700 ADT Δ - 0.6 dB
 SOUTH " " " FUTURE + PROJECT = 10,100 Δ + 2.5 dB
 NORTH " " " = 9,000 Δ + 2.2 dB

DISTANCE TO:	PRESENT	PRESENT + PROJ
* 70 CNEL	10.4	N: 67.6 at 30' = 17.3' S: 67.9 at 30' = 18.498'
* 60 CNEL	33	54.6' S: 58.4153'
* 60 CNEL	10.4	172.6' 185'

"G"

6,100	70.3 dB over the Ave	
65	at 33 FT	65.3 - 1.8 = 63.5 at 33'
*	65	at 35 FT = 23.9'
*	60	112 FT = 73.9'



SAN DIEGO ACOUSTICS, Inc.

Report No. 90-024

July 19, 1990

**Environmental Noise Analysis
Scripps Memorial Hospital Expansion
for JBF & Associates**

Introduction

This study was conducted to show the acoustic suitability of the proposed project with respect to the requirements of the City of Chula Vista Department of Planning and Land Use.

The subject expansion is located in a commercial development that is bordered on the west by Fifth Avenue, on the south by H Street and on the east by Fourth Street. The planned expansion will be bordered on the north by the Chula Vista Junior High School.

Phase 1 of the expansion will consist of an additional 3 story hospital building, a 5 story medical office building and a 352 space parking lot and several smaller parking areas.

The Ultimate Phase will include another 3 story hospital expansion, another 5 story addition to the medical office building and a 5 level parking structure in the location of the 352 parking space lot.

Approximately 7 commercial endeavors will be displaced by the proposed expansion.

Existing Noise Levels

Existing noise levels were measured as a function of automotive traffic on Fifth Avenue and on H Street. Measurements were made on May 9, 1990, between the hours of 10 and 11 A.M.

Noise levels were measured using a Bruel and Kjaer sound level meter Type 2230. This precision instrument fulfills IEC 804 Type 1 and ANSI S1.4.1971 Type 1 requirements. It provides measurement of L_{eq} , L_{max} , L_{min} as well as the current sound level.

Passing vehicles were counted simultaneously with the noise measurement so that an adjustment could be made if the passing traffic varied from the average noted by the City.

The measured data are shown in Table 1.

Table 1.
Noise Levels Measured Between 4th and 5th Streets On H Street
and Between H and G Streets On 5th Street.

Street	L_{eq}	L_{max}	L_{min}	H.T.	Veh/Hr.
"H" Street	68	82	55	4%	1508
Fifth Street	64	78	48	0%	382

Note: Distance microphone from center of street; "H" Street, 61 feet; Fifth Street, 30 feet.

Willdan (traffic consultant for the project) notes that the current volumes for the two streets are 30,100 and 5,700 ADT, respectively.

A ratios established in the Wyle Noise Model relate off peak daytime hourly traffic volumes to the Average Daily Traffic (ADT). Using this ratio and the hourly vehicle counts noted during the data measurement period, it is possible to obtain an estimate of the ADT present at the time noise levels were measured and make an adjustment if the traffic volume was different from the accepted average traffic volume. In addition, this same Wyle Model notes that the value of Leq resulting during daytime off peak hours is approximately 2 dB less than the 24 hour average, CNEL.

Correcting for the Willdan values of traffic and converting the values to CNEL, results in the establishment of noise levels associated with the average traffic volumes, upon which the location of the CNEL contours can be based. The location of these contours are contained in Table 2. (Note that present contours for "G" Street are also identified. These contours are based on the Fifth Street measurements and the traffic volume of 6,100 ADt established by Willdan. As the operating characteristics are similar for vehicles traveling on "G" and Fifth Street, this is a reasonable extension of the data.

Table 2
Location of Noise Contours On 5th Avenue and "G" and "H"
Streets.

Street	<u>Distance of Contour From Center of Street - Ft.</u>			
	Contour - CNEL	70	65	60
"H"	70'	221'	699'	
Fifth	*	33'	104'	
"G"	*	35'	112'	

Note: * - indicates noise contour located within the street.
Contours for "G" and "H" Streets are applicable between

Fourth and Fifth Streets. Contours for Fifth Street are applicable between "G" and "H" Streets.

Noise levels resulting from stationary sources attached to the current commercial establishments were not identified as the traffic noise established the existing ambient level in the neighborhood.

Future Levels

The future noise levels will result from changes in street traffic, parking facility noise and a potential from stationary HVAC and standby power sources for the hospital.

Street Traffic

Traffic noise levels were calculated on the basis of predicted volumes (Willdan) at "build out" resulting from the project and all other outside factors.

Willdan provided the "present" and "build out" traffic volumes shown in Table 3.

Table 3
Present and Build Out Traffic Volumes For Project Streets.

Street	Average Daily Trips - ADT		
	Present	At Build Out due to:	
		Community	Community+Project
Fifth N*	5,700	7,400	9,500
S*	5,700	5,300	10,100
"H"	30,100	37,000	39,700
"G"	6,100	3,100	4,000

Note: N* or S* means, north or south of the project.

Changes in traffic volume result in changes in traffic noise as a function of the relationship $10 \log(T_1/T_2)$. Where T_1 and T_2 represent the original traffic volume (ADT) and the new traffic volume. Thus, the future noise levels will increase adjacent to Fifth and "H" Streets and decrease on "G" Street. (Note that the decrease of noise on "G" Street does not result from the affect of the project but from a reduction in traffic caused by other factors.)

Between "G" and "H" Streets, on Fifth, noise levels will increase by 2.2 and 2.5 dB to the north and to the south of the project, respectively. Between Fourth and Fifth Streets the noise level will increase by 1.2 dB on "H" Street and decrease by 1.8 dB on "G" Street.

The changes in the locations of the noise contours, at "build out" are shown in Table 4.

Table 4
Location of Noise Contours On 5th Avenue and "G" and "H"
Streets At Build Out.

Street	<u>Distance of Contour From Center of Street - Ft.</u>			
	Contour - CNEL	70	65	60
"H"		92 (70)	292 (221)	923 (699)
Fifth N. of project	*	55 (33)	173 (104)	
S. of project		58 (33)	185 (104)	
"G"	*	23 (35)	74 (112)	

Note: Values inside brackets () are present contour locations.

* - indicates noise contour located within the street.

Contours for "G" and "H" Streets are applicable between Fourth and Fifth Streets. Contours for Fifth Street are applicable between "G" and "H" Streets.

Parking Facility

The primary parking for the project will occur in a space immediately adjacent to Fifth Street. An initial at grade parking lot will be built to handle approximately 352 vehicles. The second phase of construction will replace this lot with a 5 level parking garage of 775 spaces (one level will be below ground). Only the latter facility was analyzed as the volume of traffic will be much greater with a much higher potential for noise and an additional, closer, Junior High School building will likely be in existence at that time.

The parking garage was analyzed on the basis of peak hour traffic movement and the assumption that all four sides of the structure would be essentially "open". In addition, a staff and service road will exist to the north of the garage, south of the Chula Vista Junior High School property. The affect of this traffic was also taken into account. The distance from the parking garage to the face of the new school building will be 57 feet. The distance from the center of the service road to the face of the future school building will be 31 feet.

The analysis is based on the fact that an average automobile traveling at low speed (6 mph) produces a peak noise level of 70 dB(A) while passing at a distance of 10 feet. Conservatively, a passing vehicle would produce a single event level (SEL) of 78.3 dB(A). This value of SEL and the Willdan estimate of 328 vehicles in and 751 vehicles out (of these 228 vehicle would use the service road to the north) during the maximum P.M. peak hour was used to determine the maximum hourly noise which would reach the face of the nearest building, the Junior High School.

The total effect of the parking garage peak hour noise will be a level of 69 L_{eq} , at the face of the future classroom building. Of this level 61 dB would be contributed

by vehicles using the service road, 65 dB from the 1st floor, 62 dB from the 2nd floor, 60 from the 3rd floor and 54 dB from the 4th floor. Basement parking influence was assumed to be nil as it was assumed that this level would not be open on any side.

The subject of emergency vehicles was examined. Approximately 10 emergency trips per day are expected. Of these trips only one per day is expected to use the siren. In any case the siren will not be used "on the property". Three entry points are available and an equal use of each is expected. As only one "siren trip" per day is expected it will not appreciably add to the average hourly noise level and was not included in the calculations for any street.

HVAC And Standby Power

HVAC units will be located on the roof of the new buildings. It will be at least 220 feet from the nearest unit location to the nearest property line to the north. Noise levels from such units depend upon the size, type and manufacturer. None of this information has been defined at this time. Another planned hospital will utilize air handlers and return air units in the range of 7 to 10 H.P. and 10,000 to 20,000 CFM. Two air handlers and two return fans, of this type, will produce 92 PWL dB(A), or at a distance of 220 feet will result in a sound pressure level of 48 dB(A). Ten such pairs would produce 55 dB(A) at 220 feet.

The emergency power source will be two 600 KW generators driven by a diesel engine. Again, these items have not been further defined. 1200 KW would require an input of at least 1600 HP (100% efficiency). A 400 HP diesel engine produces approximately 83 dB(A) at a distance of 50 feet. Four would produce 89 dB(A) at the same distance. At 220 feet to the property line the noise level would be 76 dB(A).

The major power transformer has not been defined but a typical size might be 12 KVA at 480 volts. Such a transformer might produce a level of 68 dB(A) at a distance of 1 meter. This might be disturbing if it were located on the property line.

Mitigation

The Chula Vista Planning Department restricts the land use as a function of the exterior noise. Hospitals are usually limited to areas of 65 CNEL, or less. However, this is an expansion of an existing facility and no outdoor patient areas are planned. Thus, if interior noise limits can be met no exterior limits should be required. However, the project must adhere to the City Noise Code which restricts hourly noise levels that can be produced at the property line.

The Chula Vista City Code places limits upon the originator of noise as a function of the adjoining land use category. These categories include residential, commercial and industrial uses. The only directly adjacent neighbor (to the north) is the Chula Vista Junior High School. Schools are not covered by C.V. Noise Ordinance.

As an explicit criteria does not exist, a logical reference criteria was sought and selected. The State of California has set a limit on traffic noise permitted for elementary and secondary schools, Section 216 of the Streets and Highways Code. In essence this Code limits the noise which may be produced inside a classroom to 55 dB(A) L_{10} or 52 dB(A) L_{eq} . L_{10} refers to the level which is exceeded 10% of the time. This usually means the peak hour level. It is also generally considered that the exterior sound level is reduced by 10 dB when it arrives through an open window. Thus, a reasonable limit for peak hour noise outside the window of a school room can be 65 dB(A). This limit is used as the criteria for this project with respect to the neighbor school.

The parking garage generating 69 dB(A) has been shown to exceed the selected hourly criteria. This level would be reduced to about 61 or 62 dB(A) if the northern facing wall of the garage was solid, on all levels, ie no openings to the north.

The remaining HVAC and standby power equipment should be analyzed for compliance with the hourly noise limit when the equipment is defined and the architectural details are final. The planned enclosure for the standby power unit

may provide the necessary noise reduction depending upon the details of construction.

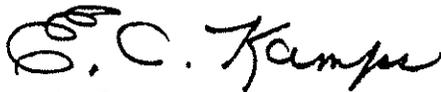
An interior noise analysis will have to be made to assure that the interior noise limits will not be exceeded. Detailed plans must be available to make this analysis.

Summary

The expected future noise levels at the site should not restrict the expansion of this hospital facility.

Future traffic noise will increase by 2.2 to 2.5 dB on Fifth Street, 1 dB on "H" Street and decrease by 2 dB on "G" Street. The project is only partially responsible for these changes.

Potential sources of project noise have been identified but cannot be predicted at this point. These sources should be made to be in compliance with the Chula Vista Noise Ordinance.



E. C. Kamps

Consultant in Acoustics

for San Diego Acoustics, Inc.

Senate Bill No. 290

CHAPTER 707

An act to amend Section 216 of the Streets and Highways Code, relating to state highways.

[Approved by Governor September 9, 1983. Filed with Secretary of State September 11, 1983.]

LEGISLATIVE COUNSEL'S DIGEST

SB 290, Ellis. State highways: noise abatement programs.

Under existing law, the Department of Transportation is required to measure noise levels and undertake noise abatement programs in specified schools along state freeways.

This bill would revise the decibel scale to be used by the department for measurement of noise levels in the schools and for qualification for the noise abatement programs.

The people of the State of California do enact as follows:

SECTION 1. Section 216 of the Streets and Highways Code is amended to read:

216. The noise level produced by the traffic on, or by the construction of, a state freeway shall be measured in the classrooms, libraries, multipurpose rooms, and spaces used for pupil personnel services of a public or private elementary or secondary school if the rooms or spaces (a) were constructed prior to the award of the initial construction contract for the freeway route and prior to January 1, 1974, or (b) were constructed after December 31, 1973, and were constructed prior to the issuance of a statement of present and projected noise levels of the freeway route by the department pursuant to subdivision (g) of Section 65302 of the Government Code, and (c) are being used for the purpose for which they were constructed.

The measurements shall be made at appropriate times during regular school hours and shall not include noise from sources that exceed the maximum permitted by law.

If the noise level produced from the freeway traffic, or the construction of the freeway, exceeds 55dBA, L10, or 52dBA, Leq., the department shall undertake a noise abatement program in any such classroom, library, multipurpose room, or space used for pupil personnel services to reduce the freeway traffic noise level therein to 55dBA, L10, or 52dBA, Leq., or less, by, but not limited to, installing acoustical materials, eliminating windows, installing air conditioning, or constructing sound baffle structures.

If the department determines that the construction of the freeway will result in a noise level exceeding 55dBA, L10, or 52dBA, Leq., the

department shall complete the temporary or permanent noise abatement program prior to commencing such construction, or as soon as practicable thereafter.

If it becomes necessary to convert the classrooms, libraries, multipurpose rooms, or spaces used for pupil personnel services to other school-related purposes because the freeway traffic noise level therein exceeds 55dBA, L10, or 52dBA, Leq., the department shall pay the cost of the conversions.

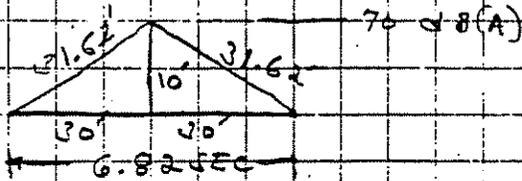
If the noise level generated from sources within and without the classrooms, libraries, multipurpose rooms, or spaces used for pupil personnel services exceeds 55dBA, L10, or 52dBA, Leq. prior to construction of the freeway and the noise from the freeway, or the construction thereof, also exceeds 55dBA, L10, or 52dBA, Leq., the department shall be required to undertake a noise abatement program that will reduce the noise to its preconstruction level.

Priority for noise abatement programs shall be given to those public and private elementary and secondary classrooms, libraries, multipurpose rooms, and spaces used for pupil personnel services constructed in conformance with Article 3 (commencing with Section 39140) of Chapter 2 of Part 23 of Division 3 of Title 2 of the Education Code.

As used in this section, dBA means decibels measured by the "A" weighting described in Section 3.1 of the American National Standard specification for sound level meters, S1.4-1971, approved April 27, 1971, and published by the American National Standards Institute. L10 is the sound level that is exceeded 10 percent of the time for the period under consideration and is a value which is an indicator of both the magnitude and frequency of occurrence of the loudest noise events. Leq. is the equivalent steady state sound which in a stated period of time would contain the same acoustic energy as the time-varying sound level during the same time period.

ASSUME

AVE SPEED IN GARAGE OR ENTRY IS 6 MPH (8.8 FT/SEC)
 MAX PARKING NOISE LEVEL IS 70 dBA AT 10 FT



$$\log / \text{HR} = 10 \log \left\{ \frac{\text{INV. LOG.} \left(\frac{70 - 20 \log \frac{D}{10'}}{10} \right)}{3600 \text{ SEC}} \times 6.82 \text{ SEC} \times \frac{D}{10'} \times N \right\}$$

TIME TO PASS DIST. AVE NO. VEH / HR

* SPL OF CAR LEAVING GARAGE AT NORTH END AT FACE OF C.V.T.H.S. (14' + 17' = 31' CTR OF ROADWAY TO FACE OF BUILDING)

PEAK PM HOUR

$$\log / \text{HR} = 10 \log \left\{ \frac{\text{INV. LOG.} \left(\frac{70 - 20 \log \frac{31}{10}}{10} \right)}{3600} \times 6.82 \times \frac{31}{10} \times 227 \right\} = 61.4$$

* SPL OF CAR INSIDE GARAGE. ALL ENTRANCES 4 LEVELS, NORTH END OF GARAGE 6' FROM FACE OF C.V.T.H.S.

PEAK PM HOUR (1079 VEH MOVING) 125' FROM CENTER OF GARAGE TO NORTH EDGE (124' + 1' = 125' CTR TO C.V.T.H.S.)

	PARK CIRCLE	ACTUAL (1079 MOVING)	Σ RATIO'S TO 1079 MOVING
4TH	150	(0) 150	216
3RD	150 + 150	(216) 300	432
2ND	150 + 150 + 150	(432) 450	648
1ST	150 + 150 + 150 + 150 + 150	(864) 750	1079
BASE	150	150	216

RATIO 1.44

ASSUME ENTRY ON 5TH AVE CIRCLE FLOOR UP TO NEXT CIRCLE, ETC.

EQUIPMENT NOISE

EMERGENCY POWER GENERATOR - 2 600 KW (80) DIESEL POWER

$$\frac{600 + 600 \text{ KW}}{1 \text{ KW}} \times 1.341 \text{ HP} = 1609 \text{ HP}$$

1 - 400 HP

0.8 GA at 50'
83 dB
86 for 2
89 for 4

746 watts = 1 HP

746 kW = 1000 HP

$$89 - 20 \log \frac{220}{50} = 76 \text{ dB(A) SPL at P.L.} \quad \star$$

enclose mufflers etc. - design for own good.

POWER TRANSFORMER - IN ELECT. EQUIP. YARD = 4 SOLID WALLS WITH
TYPICAL P.L. LOWEST CEILING / ROOF
12.5 KVA Transformer 480V = 68 dB(A) at 1 meter RAFFLE



A/C UNIT NOTED ON PLANS

RC 7 } INTAKE 10 HP ^{20K CFM} ~~10 HP~~ AIR HANDLER P.W.L. = 90 SPL_r = 70 dB(A)

AH 4 } INTAKE 10 HP ^{9K CFM} ~~10 HP~~ AIR HANDLER P.W.L. = 87 SPL_r = 67 dB(A)

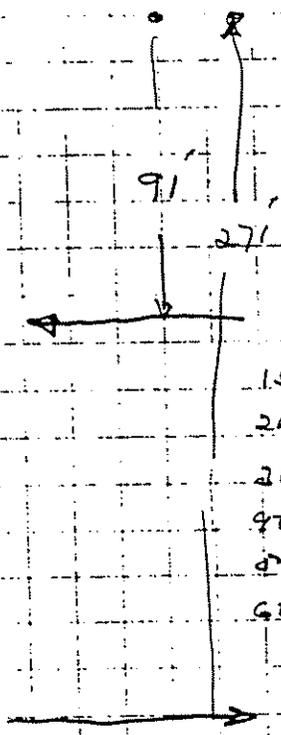
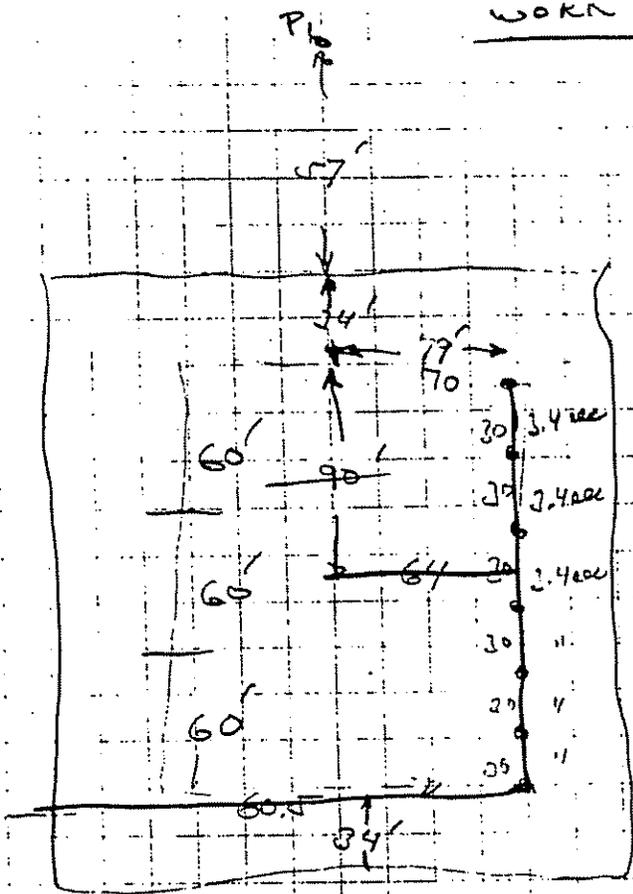
220 P.L. TO MECH HUAC ON ROOF

FREE FIELD

$$\text{2 A.H. + 2 R.F.} \approx 92 \text{ P.W.L. dB(A)} \quad \text{OR} \quad \text{SPL} = \text{P.W.L.} - 20 \log r + 2.3 \text{ dB(A)}$$

$$\text{at 220 FEET} \quad \text{SPL} = 92 - 20 \log 220 + 2.3 = 47.5 \text{ dB(A)}$$

★ 10 UNITS = $47.5 + 10 \log \frac{10}{2} = 55 \text{ dB(A)}$ See directivity due to facing intake & exhaust toward H street



DIST TO P1	
157	132
200	157
220	184
240	211
260	239
271	268

16 709.5 AT 91

66.8
65.3
63.7
62.7
61.6
60.6

AVG 64
FOR 20.48

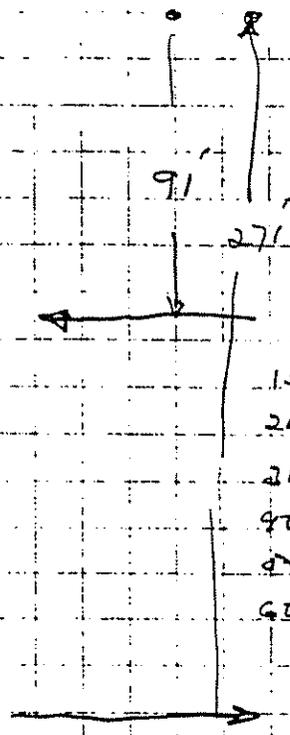
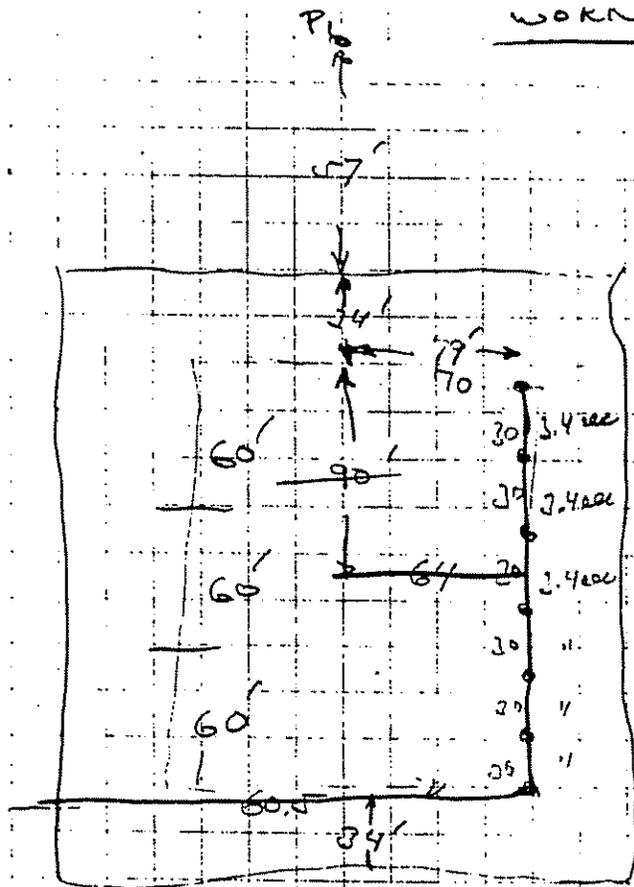
calculate as if 2 cars at each of four distances

- 57 + 34 = 91 28 CARS
- 157 28 CARS
- 211 28 CARS
- 271 28 CARS

CARS PARKED ON THIS LEVEL

CARS TRAVELING TO NEXT LEVEL (ONCE AROUND OUTSIDE)

NO CARS AT 91'
NO CARS AT 271'
NO CARS AT (-628 FOR 20.4 + 29.4 seconds)



DIST TO P1	P1
155	132
260	157
320	184
400	211
500	239
600	268

16709/5 AT 91

66.8
65.3
63.1
62.7
61.6
60.6

AVG 64
FOR 20.48

calculate as if 2 cars at each of four distances

- 57 + 34 = 91 38 CARS
 - 157 38 CARS
 - 211 38 CARS
 - 271 38 CARS
- } CARS PARKED ON THIS LEVEL

CARS TRAVELING TO NEXT LEVEL (ONCE AROUND OUTSIDE)

- NO CARS AT 91'
- NO CARS AT 271'
- NO CARS AT (-608 FOR 20.4+29.4 records)

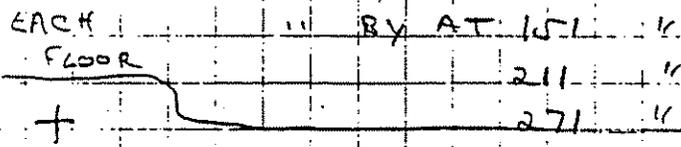
CHART CONTINUED = CIRCLING EFFECT IN GARAGE

P.M.
MAY
HR.

M
O
D
E
L

SGM: PASSBY AT 91 FEET (PARALLEL TO SCHOOL)

54 VEH
54 VEH
54 VEH
54 VEH



DISTANCE	FLOOR	NUMBER OF CARS CIRCLING			
		BASE 470	3RD	2ND	1ST
91		0	216	432	864
271		0	216	432	864
(-6dB FROM 91') (for 40.8 dB)		0	216	432	864

$70 - 6 - 20 \log \frac{91}{10}$

1ST FLOOR: $L_{dB}/HR = 10 \log \left[\frac{100 \log \left(\frac{70 - 20 \log \frac{91}{10}}{10} \right)}{3600} \right] \times 6.82 \times \frac{91}{10} \times 54 = 46.5$

PARKING
VEH

$\frac{151}{10} \times \frac{54}{10} = 48.7$
 $\frac{211}{10} \times \frac{54}{10} = 46.9$
 $\frac{271}{10} \times \frac{54}{10} = 45.8$

1ST FLOOR
CIRCLING
VEH

$L_{dB}/HR = 10 \log \left[\frac{100 \log \left(\frac{70 - 20 \log \frac{91}{10}}{10} \right)}{3600} \right] \times 6.82 \times \frac{91}{10} \times 864 = 62.5$

$\frac{271}{10} \times \frac{864}{10} = 57.8$

44.8 dB AT 40.8 dB FOR 864 VEH

$10 \log \left[\frac{100 \log \left(\frac{44.8}{10} \right)}{3600} \right] \times 40.8 \times 864 = 54.7$

54.7



SAN DIEGO ACOUSTICS, Inc.

Report No. 90-024R

April 23, 1991

**Addendum
Environmental Noise Analysis
Scripps Memorial Hospital Expansion
for Dudek & Associates**

Introduction

This Addendum to the original report, dated 7-19-90, was written to accommodate new values of parking garage traffic data which were developed after the original report was written. The change in traffic data necessitated the reanalysis of the parking garage noise and its expected affect on the adjacent Junior High School building.

Future Noise Levels

Parking Facility

The reanalysis of the parking garage was carried out in the same manner as noted in the original report. The "pm peak hour" traffic was used to calculate a worst hour noise level at the face of the school. Previously, 328 vehicles in and 751 vehicles out (a total of 1,079 vehicles) were used to determine the expected value of 69 Leq at the face of the school, during a peak hour.

The new values used in the reanalysis are 192 vehicles in and 468 vehicles out (a total of 660 vehicles). The peak hour noise level expected at the face of the school is 65 Leq.

Conclusion

Initially, it was suggested that peak hour noise level could be mitigated by closing all openings in the northern facing wall of the parking garage. On the basis of this revised peak hour traffic, the noise level from the garage will not exceed the noted criteria for the school and the garage will not require any mitigating changes.

E. C. Kamps

E. C. Kamps
Consultant in Acoustics
for San Diego Acoustics, Inc.

APPENDIX D
HAZARDOUS WASTE ASSESSMENT

Maryanne

RECEIVED

BY _____

JAN 19 1990

PLANNING DEPARTMENT
CHULA VISTA, CALIFORNIA

LIMITED HAZARDOUS WASTE
POTENTIAL ASSESSMENT

FOR

SCRIPPS MEMORIAL HOSPITAL EXPANSION
FIFTH AVENUE AND H STREET
CHULA VISTA, CALIFORNIA

JANUARY 1990

ROBERT PRATER ASSOCIATES
Consulting Soil, Foundation & Geological Engineers

Robert R. Prater, C.E. 1942-1980
Wm. David Hespeler, C.E.

January 12, 1990
349-18, 9629

Scripps Memorial Hospital
9888 Genesee Avenue
P.O. Box 28
La Jolla, California 92038

Attention: Mr. Herbert Hotaling, Director of Facilities Development

Re: Limited Hazardous Waste Potential Assessment
Proposed Scripps Memorial Hospital Expansion
Fifth Avenue and H Street
Chula Vista, California
SMH Job No. 88-0311-A

Gentlemen:

In accordance with your request we have performed a limited hazardous waste potential assessment for the subject project. The accompanying report presents the results of our field investigation, laboratory tests, and analysis. The soil and geologic conditions are discussed and our conclusions regarding potential hazardous waste contamination on-site are presented.

If you have any questions concerning our findings, please call.

Very truly yours,

ROBERT PRATER ASSOCIATES

Lawrence Jansen, C.E.G.



Frank Moreland
Senior Staff Geologist

LJ/FM:kj

Copies: Addressee (2)

James Leary Architecture and Planning, Attn: Mr. James Leary (6)

LIMITED HAZARDOUS WASTE POTENTIAL
ASSESSMENT

For

SCRIPPS MEMORIAL HOSPITAL EXPANSION
Fifth Avenue and H Street
Chula Vista, California

To

SCRIPPS MEMORIAL HOSPITAL
9888 Genesee Avenue
P.O. Box 28
La Jolla, California 92038

JANUARY 1990

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LIMITED HAZARDOUS WASTE POTENTIAL ASSESSMENT

FOR

SCRIPPS MEMORIAL HOSPITAL EXPANSION FIFTH AVENUE AND H STREET CHULA VISTA, CALIFORNIA

INTRODUCTION

In this report we present the results of our limited hazardous waste potential assessment for the subject property located at the northeast corner of Fifth Avenue and H Street in Chula Vista, California (west of the existing hospital complex). We previously performed a geotechnical feasibility study for the existing hospital complex the results of which were presented in our reports dated July 29 and November 9, 1988. In addition, we recently completed a geotechnical feasibility study for the subject expansion site, the results of which are presented in our report dated January 8, 1990. The purpose of the hazardous waste potential assessment was to make a limited evaluation of the potential for hazardous wastes being present on the subject property.

The subject site is currently occupied by a community shopping center and an Express Gas service station. The surrounding properties are primarily residential with a regional shopping center just south of the site.

It is our understanding that several three to five-story hospital, office, and parking structures with slab-on-grade floors may be constructed on the site. Details regarding the proposed development are currently unavailable. No hazardous materials spills or incidents are known or suspected to have occurred on-site.

SCOPE

Our scope of work was performed in accordance with our proposal dated August 11, 1989 and supplemental proposal dated November 21, 1989 and included: 1) review of our previous work in the vicinity as well as available geotechnical literature pertinent to the site, 2) a limited review of the site historic usage, 3) review of readily available public records regarding known hazardous materials incidents/usage in the area, 4) a surface reconnaissance of the site and near vicinity to aid in the evaluation of subsurface hazardous waste potential on-site, 5) posting a cash bond and obtaining a drilling permit with the County of San Diego Health Department, 6) exploratory drilling, 7) laboratory testing of samples recovered from the borings, 8) analysis of the resulting field and laboratory data, and 9) preparation of this report.

SITE BACKGROUND

In order to aid in the evaluation of potential hazardous waste impacting the site a limited review of historic site usage was performed. We have reviewed older aerial photographs dated 1953, 1964, 1965, 1976 and 1982. We have also reviewed older topographic maps dated 1904, 1944, 1976 and 1977. Additional information regarding historic usage was obtained from City directories on file at the San Diego Historical Society. A chain-of-title search for the subject property was performed by Ticor Title Insurance the results of which are enclosed.

LIMITED HAZARDOUS WASTE POTENTIAL ASSESSMENT

FOR

SCRIPPS MEMORIAL HOSPITAL EXPANSION FIFTH AVENUE AND H STREET CHULA VISTA, CALIFORNIA

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Based on a 1904 topographic map and past experience the site and surrounding area was originally used primarily for agricultural purposes (see 1904 Topographic Map, Figure 1). Roads and scattered structures are evident in the general area at that time. By 1944 the area of the site was still primarily agricultural with scattered structures evident (see 1944 Topographic Map, Figure 2). A gradual infilling of development had occurred primarily in the downtown Chula Vista area. The Chula Vista Junior High School is present just north of the site. No structures were evident on-site. A 1953 aerial photo shows a significant increase in developed property in the vicinity of the site (see Figure 3). The subject property and adjacent property to the east are still vacant and used for agriculture. A residential structure is present in the west-central portion of the site which, according to the San Diego City Directory, was occupied by the property owner, William Benekos. Sometime between 1960 and 1962 the Bay Hospital was constructed on the adjacent property to the east. A 1965 oblique aerial photo shows the hospital building east of the site and Chula Vista Junior High School north of the site (see Figure 4). The site is occupied by the Benekos residence and what appears to be an equipment shed along 5th Avenue. The majority of the site is cultivated in row crops. The area surrounding the site is primarily residential. The shopping center currently occupying the site was constructed in about 1968. The center includes one large single story building and several outlying retail/commercial buildings. A service station is present on the southeastern corner of the property. Drive and parking areas are paved with asphalt concrete. The original shopping center tenants consisted of a roller skating rink, cinema, bank, service station, and several restaurants. In addition, a dry cleaning shop and printing shop were present at different times in the past. The shopping center tenant mix today is very similar to the original tenant usage. Several businesses have left the center including the dry cleaners and print shop. We were unable to contact the original lessor for a more detailed tenant history. The current tenants are limited to a cinema, roller skating rink/swap meet, bank office, medical clinic, service station, and restaurants. No other businesses which typically handle or store large quantities of hazardous substances are present.

It should be noted that the above background is based on limited information and is not intended to represent a complete and detailed site history. Our research was limited by gaps in available information, the scale of available aerial photos, and the inability to contact previous site owners.

GENERAL SITE CONDITIONS

General Setting

The subject site is situated in the coastal plains province of San Diego County roughly one mile east of the San Diego Bay (see Vicinity Map, Figure 5). The property is located on a very flat-lying ancient marine wave-cut platform known as the Nestor Terrace. The natural drainage in the area is poorly developed, generally flowing from east to west. Major drainage courses in the vicinity of the site include the Sweetwater Valley to the north and Telegraph Canyon to the south. No evidence of old swales or other depressions was evident on the site from old topographic maps or aerial photographs. The site is nearly square in shape with a plan area of about 8-1/2 acres (see Site Plan, Figure 6). The site is relatively flat with elevations ranging from a high of about 61 feet along its eastern margin to a low of about 54 feet along its western margin. Drainage in the immediate area is controlled by storm drain systems. On-site drainage consists of sheet-flow toward the site perimeters.

Development in the surrounding area generally consists of a mix of retail and residential structures. The adjacent property to the north of the site is occupied by Chula Vista Junior High School. The existing Scripps Memorial Hospital complex is located adjacent to the east side of the site. The remainder of the block is occupied by medical office buildings and commercial/retail buildings. A large regional shopping center is located just south of the site across H Street. A Sears store is the anchor tenant with the remainder of the center occupied by smaller retail establishments. The properties across 5th Avenue, west of the site, are occupied by residences, a church, and several small office buildings.

The site itself includes a large, single-story, main building occupied by Roller Skate Land and an indoor swap meet. Relatively small retail spaces along the east and south sides of the building are occupied by a medical clinic and offices, and storage space for Scripps Memorial Hospital. Several small businesses also occupy spaces used primarily for storage. Seven smaller outlying buildings are present on the southern and western portions of the site (see Figure 6). One of these buildings is vacant and the remainder are occupied by a movie theater, bank, medical clinic, and several restaurants. The shopping center drives and parking areas are asphalt concrete paved. Landscaping is limited to the southwest corner of the site and islands within the parking areas. An Express Gas service station is located on the southeast corner of the site (see Figure 7). Three underground storage tanks and associated piping are located on the east side of the station. The tanks each have a capacity of 8,000 gallons and contain regular unleaded gasoline, premium unleaded gasoline, and diesel. A 550 gallon waste oil tank is located on the west side of the service station. According to Express Gas personnel the tank is empty and not in use. No other apparent hazardous materials use or storage is present on-site.

General Geology and Subsurface

Based on our review of published geotechnical literature and our previous work in the vicinity, the site is underlain by relatively shallow artificial fill soils which overlie formation sandstones and mudstones of the Bay Point Formation. The Bay Point Formation is typically comprised of marine and non-marine, medium dense, silty and clayey sandstone deposited during the late Pleistocene epoch (120,000 \pm 10,000 years before present). Occasional beds of stiff to very stiff sandy and silty clay also exist.

In light of the presence of underground storage tanks at the Express Gas facility our work included subsurface exploration and analytical testing. Our current work on-site also included exploratory drilling across the site for preliminary geotechnical investigation purposes. The subsurface investigation was performed using a truck-mounted, continuous-flight auger drill to investigate and sample the subsurface soils. Three exploratory borings were drilled on December 12 to a maximum depth of 15 feet at the Express Gas Station site (see Figure 7). Five additional borings were drilled across the site as part of our geotechnical investigation (see Figure 6). Logs of the borings and details regarding the field investigation are presented in Appendix A.

Fill soils comprised of loose to medium dense, clayey sand were encountered below the asphalt concrete pavement in the three borings at the Express Gas site to depths ranging from 2 to 5-1/2 feet. The materials encountered beneath the fill soils consisted predominantly of medium dense to dense, clayey sand (formational sandstone) to the maximum depth explored of 15 feet. In Boring 2 lenses of very stiff sandy clay (formational mud-

stone) and medium dense, silty sand (formational sandstone) were encountered within the clayey sand formational materials. Vapor monitoring with a Gastechtor 1238 was conducted during the drilling operation to help evaluate the presence of petroleum hydrocarbons. Vapor readings are noted on the boring logs in Appendix A. No gasoline odor or vapor readings were noted in any of the borings. Additionally, no visible evidence of petroleum hydrocarbon product was observed in any of the borings.

The boring logs and related information depict subsurface conditions only at the specific locations shown on the site plan and on the particular date designated on the logs. Subsurface conditions at other locations may differ from conditions occurring at these boring locations. Also, the passage of time may result in changes in the subsurface conditions due to environmental changes.

Ground Water

Based on our current work on-site, previous work in the area, review of available geotechnical literature, and the Department of Water Resources Bulletin 106, we anticipate the depth to ground water beneath the site is on the order of 50 feet. The direction of ground-water flow generally follows a subdued reflection of the surface topography. Accordingly, we anticipate ground water to flow from east to west beneath the site.

The principal supply of water to the area is from imported sources. Based on a review of published data and our reconnaissance of the area there are no known water wells located within a minimum one mile radius of the site.

Ground water quality in the area generally ranges from marginal to inferior due to naturally occurring high levels of total dissolved solids. Past use of ground water has typically been limited to irrigation use. No evidence of current ground water pumping was observed in the vicinity of the subject property.

ANALYTICAL TESTING

During our field investigation samples were collected from each boring at the Express Gas station for analytical testing. Details regarding general sampling protocol are presented in Appendix A. Representative samples were also collected from the geotechnical borings across the remainder of the site for analyses. The testing was performed by Analytical Technologies, Inc. Details regarding the testing and the laboratory test results are presented in Appendix B.

In order to further evaluate potential petroleum product contamination from the Express Gas underground storage tanks and related piping two selected samples from each boring were tested for total petroleum hydrocarbons by EPA test method 8015 (modified). Each of the soil samples tested contained less than the detectable limits (5 parts per million) of petroleum hydrocarbons. Due to the past agricultural usage on-site two representative samples of the near surface soils were obtained for testing during our geotechnical subsurface investigation. These samples were tested for pesticides in common use prior to 1968. One sample each from Borings 2 and 5 were tested for pesticides, PCB's and chlorinated herbicides by EPA methods 8080 and 8150, respectively. The test results indicated no detectable levels of pesticides, PCB's or chlorinated herbicides.

REGULATORY DATA REVIEW

Our scope of work also included a review of certain public records regarding hazardous materials storage and/or incidents in the area. We have reviewed a current computer listing of sites/facilities regulated by the Hazardous Materials Management Division of the County of San Diego Health Department (HMMD) as well as their unauthorized release listing. We have also reviewed an underground storage tank list (unauthorized releases) dated October 20, 1989 from the local office of the State Regional Water Quality Control Board (RWQCB). We have reviewed the State Hazardous Waste and Substances Sites List (Cortese) dated June 1989, a State Superfund List dated January 1986 (listing provided under AB-129), and the U.S. EPA CERCLIS listings of superfund sites in San Diego County dated March 7, 1989. We also contacted the Chula Vista Fire Department to obtain information regarding permitted underground storage tanks in the area.

Based on our review and reconnaissance of the area, it is evident that some of the businesses in the area handle, use, and store hazardous materials. The majority of the materials used are gasoline, diesel, waste oils, and solvents.

The following sites within a half mile of the property were identified in the HMMD unauthorized release listing (see Figure 5):

<u>Site</u>	<u>Case Type</u>	<u>Status</u>
1) Town & Country Kawasaki 399 Broadway	contaminated soil	case closed
2) H Street Auto Wash 498 Broadway	failed precision test	case closed
3) El Pollo Loco (Thrifty #080) 666 H Street	leak being confirmed	preliminary assessment
4) Fire Station #1 447 F Street	contaminated soil	case closed
5) Firestone Tire and Rubber 598 5th Avenue	contaminated soil	preliminary assessment

Additional facilities in the immediate vicinity of the site which have permitted underground storage tanks are listed below:

<u>Site</u>	<u>Materials Stored</u>
Scripps Memorial Hospital 435 H Street	diesel
Express Oil and Gas Company 455 H Street (on-site)	diesel, gasoline

Additionally, the City of Chula Vista Fire Department shows a permit for a 550-gallon waste oil tank located at the Express Gas station. This tank is reportedly not in use.

The RWQCB underground storage tank list and the Cortese list were essentially the same as the HMMD unauthorized release listing. No state superfund or U.S. EPA superfund sites were listed in the vicinity of the site. Based on available maps provided by the San Diego County Solid Waste Department, there are no landfills or dumpsites in the immediate vicinity of the property. The closest facility is the closed Duck Pond Landfill located approximately 1-1/2 miles north of the property.

CONCLUSIONS

Based on our research, subsurface exploration, and analytical testing, there is no evidence of existing hazardous waste contamination on-site. Based on the previous agricultural usage of the site there is a possibility of residual pesticides and herbicides being present on the property. Analytical testing of representative samples of the near surface soils indicated less than detectable levels of pesticides, PCB's and herbicides. Although these materials may be present in other portions of the site, we consider the overall potential for pesticides and herbicides impacting the site to be minimal. The primary potential source of hazardous material contamination on-site is from leaking underground storage tanks and associated piping at the Express Gas service station. Our subsurface exploration and analytical testing did not reveal evidence of leakage. In addition, precision testing of the tanks has shown no evidence of leakage. The 550 gallon waste oil tank on-site is reportedly empty and not in use. No details concerning this tank are available. Based on our investigation of the Express Gas site there is no evidence of significant leakage. Some leakage and/or localized soil contamination, however, may be present at locations other than those explored. Due to the depth to ground water and relatively low permeability of the formational materials it is our opinion that the potential for ground-water contamination is low. The remainder of the shopping center is occupied by businesses which generally do not handle significant quantities of hazardous materials. The dry cleaning shop and printing shop, which were present on-site in the past, would typically handle relatively small quantities of hazardous materials. We were unable to obtain detailed information on these businesses. It is our opinion, however, that these types of businesses present a low potential for impacting the site.

Most of the area surrounding the site is generally residential with some retail and commercial usage which present a relatively low potential for impacting the site. An underground diesel storage tank is present at the existing Scripps Memorial Hospital just east of the site. The Scripps Memorial Hospital tank is also precision tested yearly. According to Mr. Howard Reed, the maintenance supervisor at Scripps, maintenance personnel also test this tank on a weekly basis. In our opinion the potential for leakage from this tank impacting the site is considered very low.

Our review of available regulatory data indicates that although the general area of the site is primarily residential there are scattered facilities which handle, store, and/or use hazardous materials. No large scale users of hazardous materials are present in close proximity to the site. Most unauthorized releases noted in the regulatory data have reached "case closed" status. These incidents are not anticipated to impact the subject site.

Two additional unauthorized releases were reported which are in the preliminary assessment stage: 1) El Pollo Loco (formerly Thrifty #080), 666 H Street, and 2) Firestone Tire and Rubber, 598 5th Avenue. The El Pollo Loco site is about 1/4 mile west of the site and the Firestone site about 1,000 feet south of the site. Based on their distance from the site, the low permeability of the formational materials, depth to the water table, and their relative down-gradient positions with respect to the water table, it is our opinion that the potential for these incidents impacting the site is remote.

LIMITATIONS

It should be noted that our current scope of services was limited to review of our previous work on-site, subsurface exploration at specific boring locations, and laboratory testing of selected samples for total petroleum hydrocarbons, pesticides and herbicides. Samples were not tested for other types of hazardous materials. In addition, the location of borings were limited to accessible portions of the site.

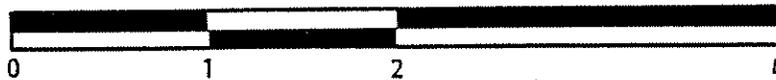
Due to the nature of the work it is necessary to extrapolate between boring locations. Therefore, our opinion is based solely on our previous studies, current research of the site, current exploration and analytical testing results and does not preclude the possibility of additional hazardous wastes being present on-site. Our investigation did not indicate evidence for contamination associated with the Express Gas facility. There is still a potential, however, for contamination on-site which was not discovered at this time. We recommend that the project plans include a contingency for encountering hazardous materials during future site development. Our investigation was limited to an evaluation of the subsurface conditions on-site. No investigation of the on-site structure was performed to evaluate potential asbestos containing materials.

The information and conclusions presented herein do not represent legal opinions. If legal information regarding the site conditions are desired we recommend that a qualified attorney experienced in environmental laws be retained.

Our services consist of professional opinions and recommendations made in accordance with generally accepted geotechnical engineering principles and practices. This warranty is in lieu of all other warranties either express or implied.



Approximate Scale (miles)



Base: A U.S.G.S. topographic map titled "San Diego Quadrangle," dated 1904.

ROBERT PRATER ASSOCIATES
 Consulting Soil, Foundation & Geological Engineers

1904 TOPOGRAPHIC MAP

SCRIPPS MEMORIAL HOSPITAL EXPANSION
 Chula Vista, California

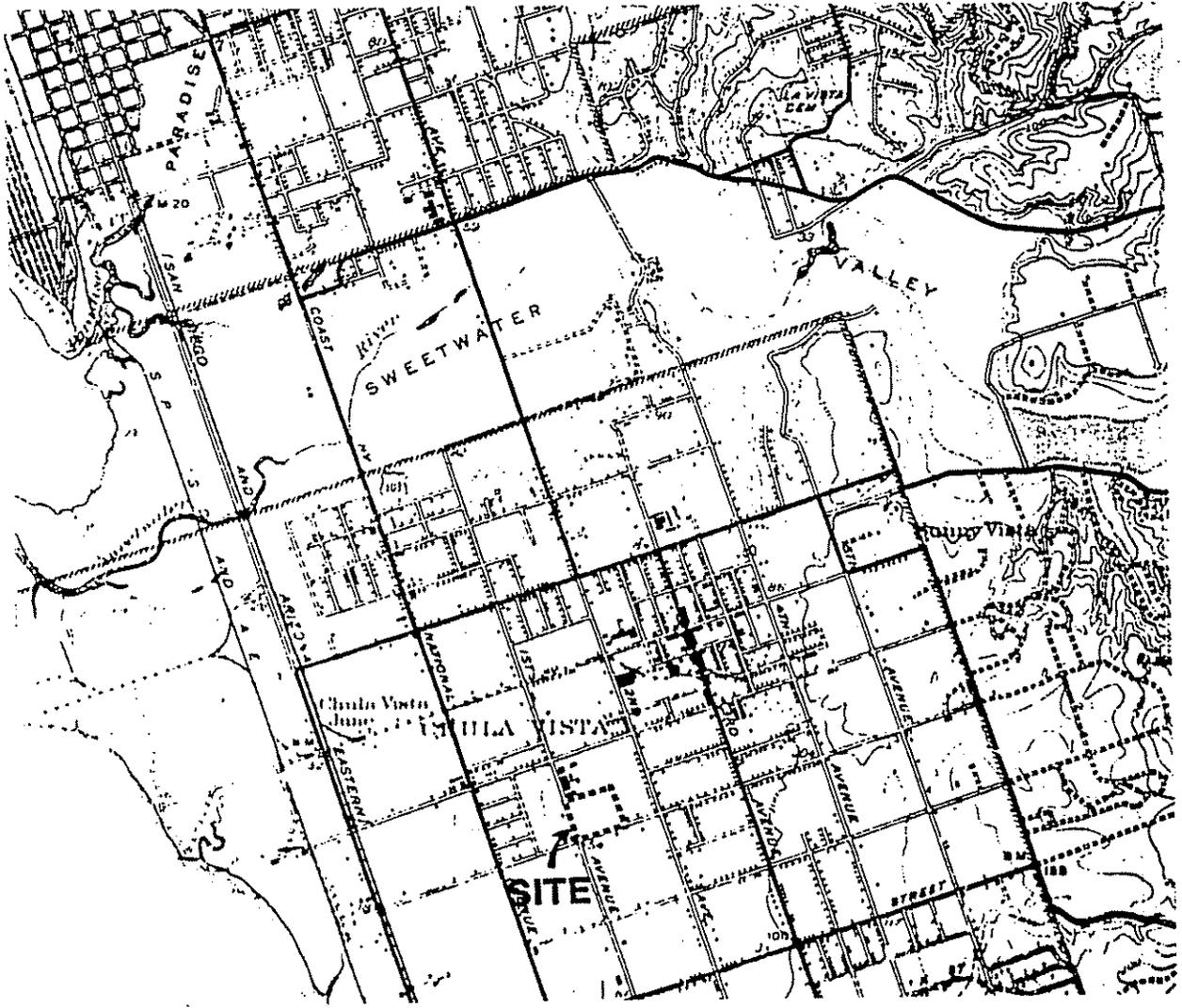
PROJECT NO.

DATE

349-18

January 1990

Figure 1



Approximate Scale (miles)



Base: A U.S.G.S. topographic map titled "National City, California," dated 1944.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	1944 TOPOGRAPHIC MAP	
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California	
	PROJECT NO.	DATE
	349-18	January 1990
Figure 2		



NO SCALE

ROBERT PRATER ASSOCIATES
Consulting Soil, Foundation & Geological Engineers

1953 AERIAL PHOTOGRAPH

SCRIPPS MEMORIAL HOSPITAL EXPANSION
Chula Vista, California

PROJECT NO.

DATE

349-18

January 1990

Figure 3



NO SCALE

ROBERT PRATER ASSOCIATES
Consulting Soil, Foundation & Geological Engineers

1965 AERIAL PHOTOGRAPH

SCRIPPS MEMORIAL HOSPITAL EXPANSION
Chula Vista, California

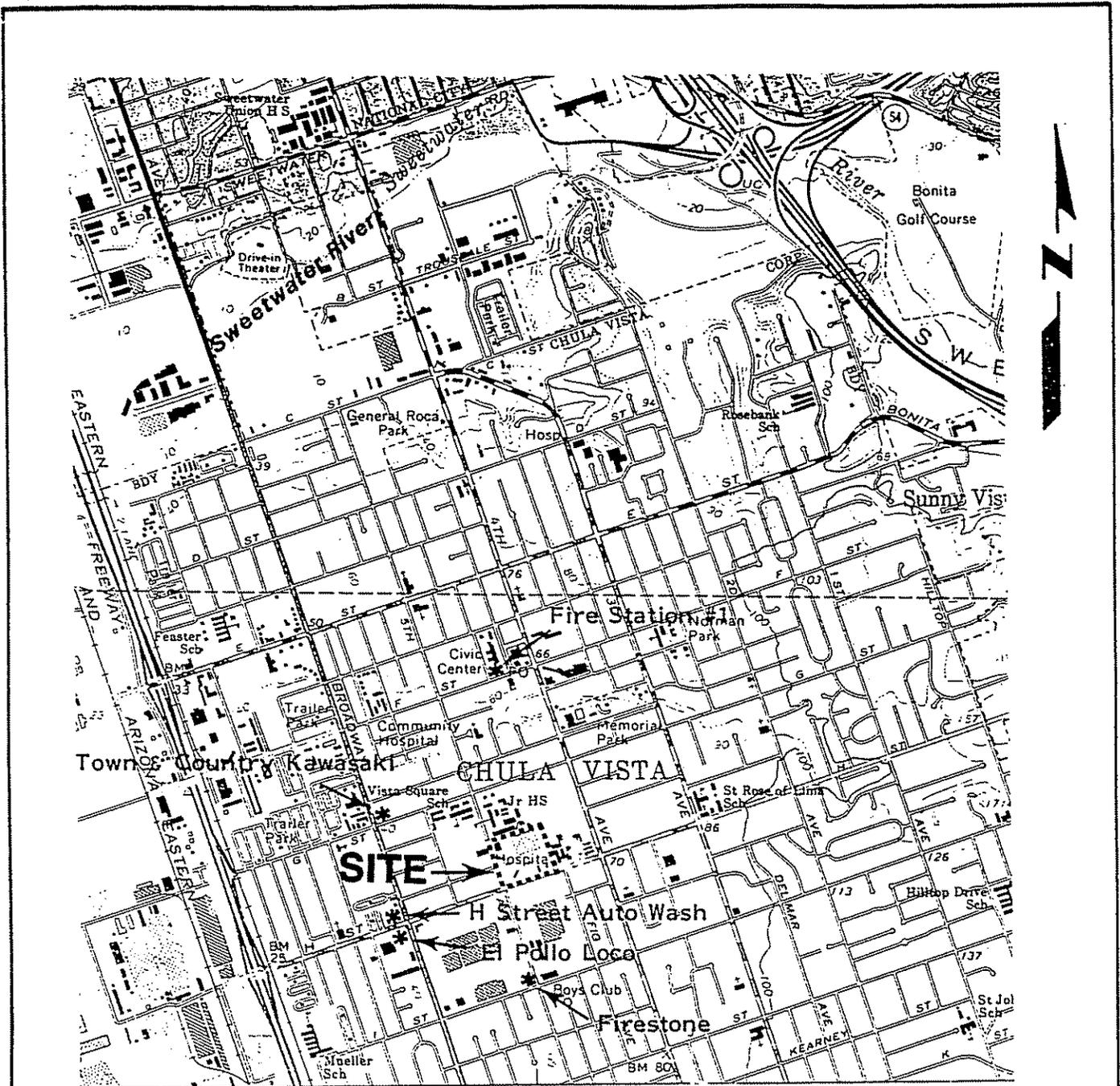
PROJECT NO.

DATE

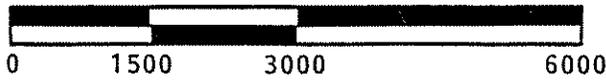
349-18

January 1990

Figure 4



Approximate Scale (feet)



Base: A U.S.G.S. topographic map titled "National City, California," dated 1967, photorevised 1975.

ROBERT PRATER ASSOCIATES
 Consulting Soil, Foundation & Geological Engineers

VICINITY MAP

SCRIPPS MEMORIAL HOSPITAL EXPANSION
 Chula Vista, California

PROJECT NO.

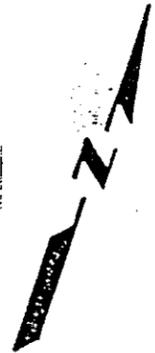
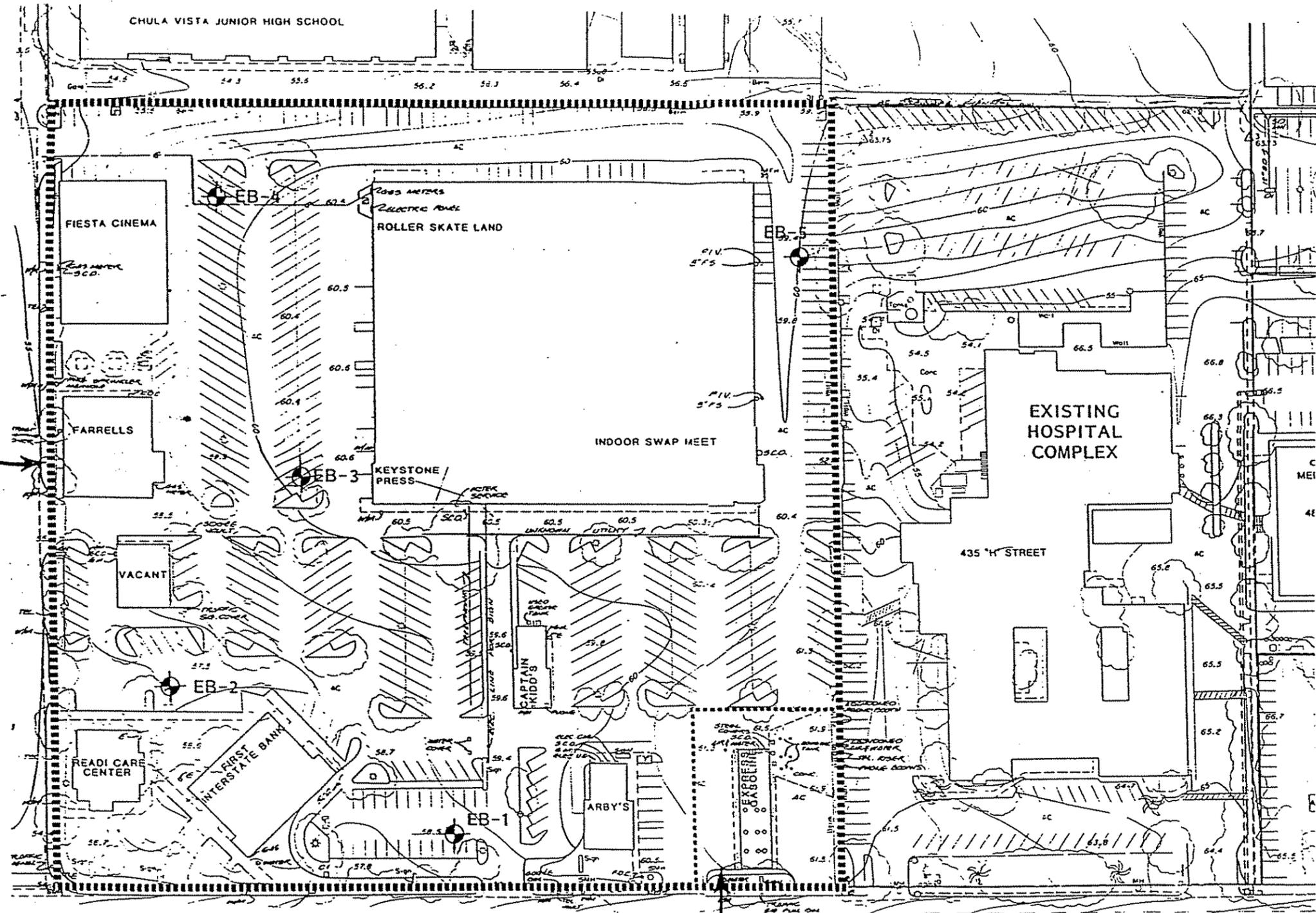
DATE

Figure 5

349-18

January 1990

Approximate limits of proposed expansion site

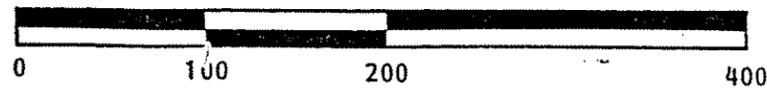


LEGEND

EB-1 Approximate location of exploratory boring

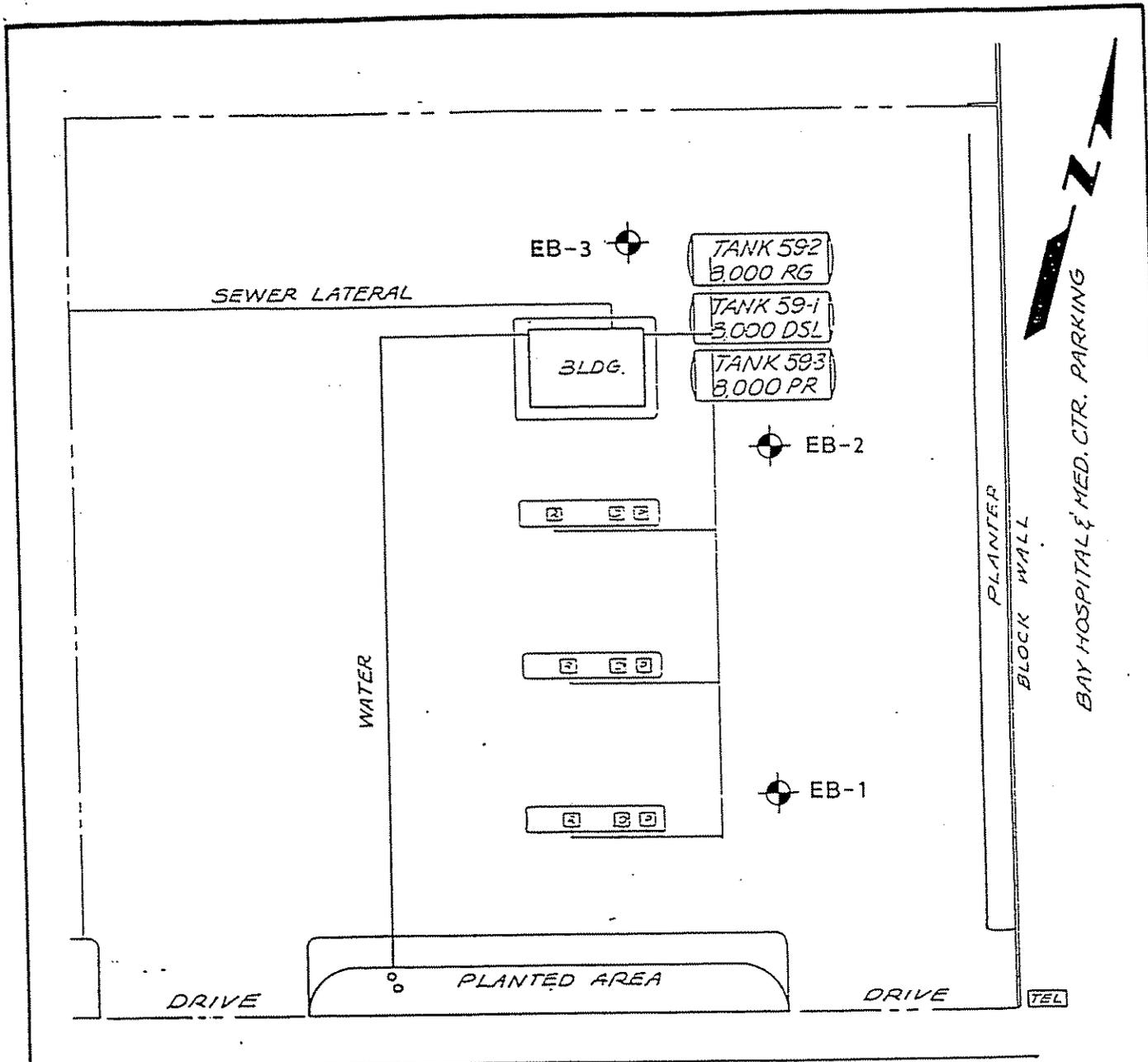
See Figure 7

Approximate Scale (feet)



Base: A site plan titled "Scripps South Bay Hospital, Chula Vista, California," dated January 2, 1989, prepared by Safino, Butcher & Ormonde.

ROBERT PRATER ASSOCIATES <i>Consulting Soil, Foundation & Geological Engineers</i>			SITE PLAN		
SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
PROJECT NO.	DATE				
349-18	January 1990	Figure 6			



H STREET

Approximate Scale (feet)



LEGEND

EB-1  Approximate location of exploratory boring

Base: An undated site plan titled "Unocal 76, 455 H Street, Chula Vista," provided by James Leary Architecture and Planning.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	SITE PLAN (Express Gas)		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	Figure 7
	349-18	January 1990	

APPENDIX A FIELD INVESTIGATION

The field investigation consisted of a surface reconnaissance and a subsurface exploration program utilizing a truck-mounted, continuous-flight auger drill. In addition, during the drilling operation, vapor from the auger cuttings was monitored utilizing a Gas Techor Model 1238 to detect the presence of hydrocarbons. Three exploratory borings were drilled on December 12, 1989 at the approximate locations shown on the Site Plan, Figure 7. The soils encountered in the borings were continuously logged in the field by our representative and described in accordance with the Unified Soil Classification System (ASTM D 2487). Logs of the borings as well as a key for soil classification are included as part of this appendix. The boring locations shown on Figure 7 were estimated from an undated site plan titled "Unocal 76, 455 H Street, Chula Vista," provided by James Leary Architecture and Planning.

Representative samples were obtained from the borings at selected depths appropriate to the investigation. All samples were transported on ice to Analytical Technologies, Incorporated for testing. Chain-of-custody procedures were followed. All sampling equipment was detergent washed and rinsed with deionized water prior to usage and between sampling to avoid cross contamination. Augers and other drilling equipment were steam cleaned between borings. All samples were placed in laboratory prepared jars. Soil samples were obtained during drilling by driving a cleaned 2-inch O.D. split spoon sampler at the selected depths.

The boring log notation for the standard split spoon sampler is indicated below.



Indicates Standard Split Spoon Sampler

The boring logs show our interpretation of the subsurface conditions on the date and at the locations indicated, and it is not warranted that they are representative of subsurface conditions at other locations and times.

PRIMARY DIVISIONS			GROUP SYMBOL	SECONDARY DIVISIONS
COARSE GRAINED SOILS MORE THAN HALF OF MATERIAL IS LARGER THAN NO. 200 SIEVE SIZE	GRAVELS MORE THAN HALF OF COARSE FRACTION IS LARGER THAN NO. 4 SIEVE	CLEAN GRAVELS (LESS THAN 5% FINES)	GW	Well graded gravels, gravel-sand mixtures, little or no fines.
			GP	Poorly graded gravels or gravel-sand mixtures, little or no fines.
		GRAVEL WITH FINES	GM	Silty gravels, gravel-sand-silt mixtures, non-plastic fines.
			GC	Clayey gravels, gravel-sand-clay mixtures, plastic fines.
	SANDS MORE THAN HALF OF COARSE FRACTION IS SMALLER THAN NO. 4 SIEVE	CLEAN SANDS (LESS THAN 5% FINES)	SW	Well graded sands, gravelly sands, little or no fines.
			SP	Poorly graded sands or gravelly sands, little or no fines.
		SANDS WITH FINES	SM	Silty sands, sand-silt mixtures, non-plastic fines.
			SC	Clayey sands, sand-clay mixtures, plastic fines.
FINE GRAINED SOILS MORE THAN HALF OF MATERIAL IS SMALLER THAN NO. 200 SIEVE SIZE	SILTS AND CLAYS LIQUID LIMIT IS LESS THAN 50%		ML	Inorganic silts and very fine sands, rock flour, silty or clayey fine sands or clayey silts with slight plasticity.
			CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays.
			OL	Organic silts and organic silty clays of low plasticity.
	SILTS AND CLAYS LIQUID LIMIT IS GREATER THAN 50%		MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts.
			CH	Inorganic clays of high plasticity, fat clays.
			OH	Organic clays of medium to high plasticity, organic silts.
HIGHLY ORGANIC SOILS			Pt	Peat and other highly organic soils.

DEFINITION OF TERMS

SILTS AND CLAYS	U.S. STANDARD SERIES SIEVE			CLEAR SQUARE SIEVE OPENINGS			COBBLES	BOULDERS
	200	40	10	4	3/4"	3"		
	SAND			GRAVEL				
	FINE	MEDIUM	COARSE	FINE	COARSE			

GRAIN SIZES

SANDS, GRAVELS AND NON-PLASTIC SILTS	BLOWS/FOOT [†]
VERY LOOSE	0 - 4
LOOSE	4 - 10
MEDIUM DENSE	10 - 30
DENSE	30 - 50
VERY DENSE	OVER 50

RELATIVE DENSITY

[†] Number of blows of 140 pound hammer falling 30 inches to drive a 2 inch O.D. (1-3/8 inch I.D.) split spoon ASTM D-1586).

[‡] Unconfined compressive strength in tons/sq. ft. as determined by laboratory testing or approximated by the standard penetration test (ASTM D-1586), pocket penetrometer, torvane, or visual observation.

CLAYS AND PLASTIC SILTS	STRENGTH [‡]	BLOWS/FOOT [†]
VERY SOFT	0 - 1/4	0 - 2
SOFT	1/4 - 1/2	2 - 4
FIRM	1/2 - 1	4 - 8
STIFF	1 - 2	8 - 16
VERY STIFF	2 - 4	16 - 32
HARD	OVER 4	OVER 32

CONSISTENCY

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	KEY TO EXPLORATORY BORING LOGS Unified Soil Classification System (ASTM D-2487)		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	Figure A-1
	349-18	January 1990	

DRILL RIG	Continuous Flight Auger	SURFACE ELEVATION	62' (approx.)	LOGGED BY	FOM
DEPTH TO GROUNDWATER	None	BORING DIAMETER	8 Inches	DATE DRILLED	12/12/89

DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	Combustible Gas Readings (ppm)	Total Petroleum Hydrocarbons (ppm)	
DESCRIPTION AND REMARKS	SYMBOL	COLOR	CONSIST.	SOIL TYPE							
ASPHALT CONCRETE PAVEMENT											
CLAYEY SAND (fill)		reddish brown	medium dense	SC	1						
					2						
CLAYEY SAND (formational sandstone)		reddish brown	medium dense	SC	3						
no odor or visible evidence of contamination					4		17		0	<5.0	
					5						
					6						
					7						
					8		14		0	<5.0	
					9						
					10						
					11						
					12						
					13		23		0		
					14						
					15						
	Bottom of Boring = 15 Feet										

Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.

ROBERT PRATER ASSOCIATES <i>Consulting Soil Foundation & Geological Engineers</i>	EXPLORATORY BORING LOG		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	BORING NO.
	349-18	January 1990	1

DRILL RIG Continuous Flight Auger				SURFACE ELEVATION 62' (approx.)		LOGGED BY FOM				
DEPTH TO GROUNDWATER None				BORING DIAMETER 8 Inches		DATE DRILLED 12/12/89				
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	Combustible Gas Readings (ppm)	Total Petroleum Hydrocarbons (ppm)
DESCRIPTION AND REMARKS	SYMBOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT					1					
CLAYEY SAND (fill) FILL ↑		reddish brown	loose	SC	2		7		0	
					3					
					4					
CLAYEY SAND (formational sandstone) no odor or visible evidence of contamination		reddish brown	medium dense	SC	5		13		0	
					6					
					7					
SILTY SAND (formational sandstone)		reddish brown	medium dense	SM	8		12		25	<5.0
					9					
SANDY CLAY (formational mudstone)		brown	very stiff	CL	10		24		0	
					11					
					12					
CLAYEY SAND (formational sandstone)		brown	dense	SC	13		31		0	<5.0
					14					
Bottom of Boring = 15 Feet					15					
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
					PROJECT NO.		DATE		BORING NO.	
					349-18		January 1990		2	

CRILL RIG Continuous Flight Auger	SURFACE ELEVATION 62' (approx.)	LOGGED BY FOM
DEPTH TO GROUNDWATER None	BORING DIAMETER 8 Inches	DATE DRILLED 12/12/89

DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	Combustible Gas Readings (ppm)	Total Petroleum Hydrocarbons (ppm)				
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE										
ASPHALT CONCRETE PAVEMENT					1									
CLAYEY SAND (fill)		reddish brown	medium dense	SC	2									
FILL ↑ CLAYEY SAND (formational sandstone) no odor or visible evidence of contamination		reddish brown	medium dense	SC	3		17		0					
	4													
	5													
	6					21		0						
	7													
	8													
	9					20		0	<5.0					
	10													
	11													
	12					25		0						
	13													
	14					21		0	<5.0					
	15													
	Bottom of Boring = 15 Feet													

Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.

ROBERT PRATER ASSOCIATES <i>Consulting Soil Foundation & Geological Engineers</i>	EXPLORATORY BORING LOG		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	BORING NO.
	349-18	January 1990	3

APPENDIX B
ANALYTICAL TEST RESULTS



ATI I.D. 912176

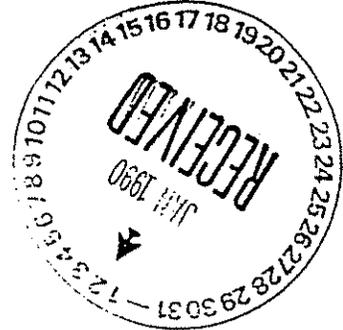
December 28, 1989

Robert Prater Associates
10505 Roselle Street
San Diego, California 92121

Project Name: Scripps-Chula Vista

Project No.: 349-18

Attention: Larry Jansen



On December 13, 1989, Analytical Technologies, Inc. received eight soil samples for analyses. The samples were analyzed with EPA methodology or equivalent methods as specified in the attached analytical schedule. The symbol for "less than" indicates a value below the reportable detection limit. Please see the attached sheet for the sample cross reference.

The results of these analyses and quality control data are enclosed.

Marcilen Lindsey
Marcilen Lindsey
Senior Project Manager

Richard M. Amano
Richard M. Amano
Laboratory Manager

ML:bc



ANALYTICAL SCHEDULE

CLIENT: ROBERT PRATER ASSOCIATES
PROJECT NAME: SCRIPPS-CHULA VISTA

PROJECT NO.: 349-18

ANALYSIS	TECHNIQUE	REFERENCE/METHOD
ORGANOCHLORINE PESTICIDES AND PCBs	GC/ECD	EPA 8080
CHLORINATED HERBICIDES	GC/ECD	EPA 8150
FUEL HYDROCARBONS	GC/FID	EPA 8015 (MODIFIED)/ CDOHS METHOD



Analytical Technologies, Inc.

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
ATI I.D. : 912176

DATE RECEIVED : 12/13/89
REPORT DATE : 12/27/89

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	EB-1 @ 4	SOIL	12/12/89
02	EB-1 @ 8	SOIL	12/12/89
03	EB-2 @ 9	SOIL	12/12/89
04	EB-2 @ 14 1/2	SOIL	12/12/89
05	EB-3 @ 9	SOIL	12/12/89
06	EB-3 @ 14 1/2	SOIL	12/12/89
07	EB-2 @ 2A	SOIL	12/11/89
08	EB-5 @ 2 1/2A	SOIL	12/12/89

----- TOTALS -----

MATRIX	# SAMPLES
SOIL	8

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.



GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217607

TEST : EPA 8080 (ORGANOCHLORINE PESTICIDES AND PCB'S)

CLIENT	: ROBERT PRATER ASSOC.	DATE SAMPLED	: 12/11/89
PROJECT #	: 349-18	DATE RECEIVED	: 12/13/89
PROJECT NAME	: SCRIPPS-CHULA VISTA	DATE EXTRACTED	: 12/13/89
CLIENT I.D.	: EB-2 @ 2A	DATE ANALYZED	: 12/15/89
SAMPLE MATRIX	: SOIL	UNITS	: MG/KG
		DILUTION FACTOR	: 1

COMPOUNDS	RESULTS
ALDRIN	<0.005
ALPHA - BHC	<0.005
BETA - BHC	<0.005
GAMMA-BHC (LINDANE)	<0.005
DELTA - BHC	<0.005
CHLORDANE	<0.050
P, P'-DDD	<0.010
P, P'-DDE	<0.010
P, P'-DDT	<0.010
O, P'-DDD	<0.010
O, P'-DDE	<0.010
O, P'-DDT	<0.010
DIELDRIN	<0.010
ENDOSULFAN I	<0.005
ENDOSULFAN II	<0.010
ENDOSULFAN SULFATE	<0.010
ENDRIN	<0.010
ENDRIN KETONE	<0.010
HEPTACHLOR	<0.005
HEPTACHLOR EPOXIDE	<0.005
METHOXYCHLOR	<0.050
TOXAPHENE	<0.10
AROCLOR 1016	<0.050
AROCLOR 1221	<0.050
AROCLOR 1232	<0.050
AROCLOR 1242	<0.050
AROCLOR 1248	<0.050
AROCLOR 1254	<0.050
AROCLOR 1260	<0.050

SURROGATE PERCENT RECOVERIES

DBC (%)

76



GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217608

TEST : EPA 8080 (ORGANOCHLORINE PESTICIDES AND PCB'S)

CLIENT	: ROBERT PRATER ASSOC.	DATE SAMPLED	: 12/12/89
PROJECT #	: 349-18	DATE RECEIVED	: 12/13/89
PROJECT NAME	: SCRIPPS-CHULA VISTA	DATE EXTRACTED	: 12/13/89
CLIENT I.D.	: EB-5 @ 2 1/2A	DATE ANALYZED	: 12/15/89
SAMPLE MATRIX	: SOIL	UNITS	: MG/KG
		DILUTION FACTOR	: 1

COMPOUNDS	RESULTS
ALDRIN	<0.005
ALPHA - BHC	<0.005
BETA - BHC	<0.005
GAMMA-BHC (LINDANE)	<0.005
DELTA - BHC	<0.005
CHLORDANE	<0.050
P,P'-DDD	<0.010
P,P'-DDE	<0.010
P,P'-DDT	<0.010
O,P'-DDD	<0.010
O,P'-DDE	<0.010
O,P'-DDT	<0.010
DIELDRIN	<0.010
ENDOSULFAN I	<0.005
ENDOSULFAN II	<0.010
ENDOSULFAN SULFATE	<0.010
ENDRIN	<0.010
ENDRIN KETONE	<0.010
HEPTACHLOR	<0.005
HEPTACHLOR EPOXIDE	<0.005
METHOXYCHLOR	<0.050
TOXAPHENE	<0.10
AROCLOR 1016	<0.050
AROCLOR 1221	<0.050
AROCLOR 1232	<0.050
AROCLOR 1242	<0.050
AROCLOR 1248	<0.050
AROCLOR 1254	<0.050
AROCLOR 1260	<0.050

SURROGATE PERCENT RECOVERIES

DBC (%)

76



REAGENT BLANK

TEST : EPA 8080 (ORGANOCHLORINE PESTICIDES AND PCB'S)

CLIENT : ROBERT PRATER ASSOC.
 PROJECT # : 349-18
 PROJECT NAME : SCRIPPS-CHULA VISTA
 CLIENT I.D. : REAGENT BLANK

ATI I.D. : 912176
 DATE EXTRACTED : 12/13/89
 DATE ANALYZED : 12/15/89
 UNITS : MG/KG
 DILUTION FACTOR : N/A

COMPOUNDS	RESULTS
ALDRIN	<0.005
ALPHA - BHC	<0.005
BETA - BHC	<0.005
GAMMA-BHC (LINDANE)	<0.005
DELTA - BHC	<0.005
CHLORDANE	<0.050
P,P'-DDD	<0.010
P,P'-DDE	<0.010
P,P'-DDT	<0.010
O,P'-DDD	<0.010
O,P'-DDE	<0.010
O,P'-DDT	<0.010
DIELDRIN	<0.010
ENDOSULFAN I	<0.005
ENDOSULFAN II	<0.010
ENDOSULFAN SULFATE	<0.010
ENDRIN	<0.010
ENDRIN KETONE	<0.010
HEPTACHLOR	<0.005
HEPTACHLOR EPOXIDE	<0.005
METHOXYCHLOR	<0.050
TOXAPHENE	<0.10
AROCLOR 1016	<0.050
AROCLOR 1221	<0.050
AROCLOR 1232	<0.050
AROCLOR 1242	<0.050
AROCLOR 1248	<0.050
AROCLOR 1254	<0.050
AROCLOR 1260	<0.050

SURROGATE PERCENT RECOVERIES

DBC (%)

81



QUALITY CONTROL DATA

ATI I.D. : 912176

TEST : EPA 8080 (ORGANOCHLORINE PESTICIDES AND PCB'S)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
REF I.D. : 91217608

DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/15/89
SAMPLE MATRIX : SOIL
UNITS : MG/KG

Table with 7 columns: COMPOUNDS, SAMPLE CONC. RESULT, SPIKED SAMPLE, SPIKED % REC., DUP. SAMPLE, DUP. % REC., RPD. Rows include GAMMA BHC, HEPTACHLOR, ALDRIN, DIELDRIN, ENDRIN, P,P'-DDT.

% Recovery = (Spike Sample Result - Sample Result) / Spike Concentration X 100

RPD (Relative % Difference) = (Spiked Sample Result - Duplicate Spike Sample Result) / Average of Spiked Sample X 100



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217607

TEST : EPA 8150 (CHLORINATED HERBICIDES)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-2 @ 2A
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/11/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/15/89
DATE ANALYZED : 12/19/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

2,4-D	<0.004
2,4,5-TP (SILVEX)	<0.002
DICAMBA	<0.004
2,4,5-T	<0.002
2,4-DB	<0.004
DINOSEB	<0.004
DICHLORPROP	<0.004



GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217608

TEST : EPA 8150 (CHLORINATED HERBICIDES)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-5 @ 2 1/2A
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/15/89
DATE ANALYZED : 12/19/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS	RESULTS
2,4-D	<0.004
2,4,5-TP (SILVEX)	<0.002
DICAMBA	<0.004
2,4,5-T	<0.002
2,4-DB	<0.004
DINOSEB	<0.004
DICHLORPROP	<0.004



REAGENT BLANK

TEST : EPA 8150 (CHLORINATED HERBICIDES)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : REAGENT BLANK

ATI I.D. : 912176
DATE EXTRACTED : 12/15/89
DATE ANALYZED : 12/19/89
UNITS : MG/KG
DILUTION FACTOR : N/A

COMPOUNDS	RESULTS
2,4-D	<0.004
2,4,5-TP (SILVEX)	<0.002
DICAMBA	<0.004
2,4,5-T	<0.002
2,4-DB	<0.004
DINOSEB	<0.004
DICHLORPROP	<0.004



QUALITY CONTROL DATA

ATI I.D. : 912176

TEST : EPA 8150 (CHLORINATED HERBICIDES)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
REF I.D. : REAGENT SOIL

DATE EXTRACTED : 12/15/89
DATE ANALYZED : 12/19/89
SAMPLE MATRIX : SOIL
UNITS : MG/KG

Table with 7 columns: COMPOUNDS, SAMPLE CONC. RESULT, SPIKED SPIKED, % REC., DUP. SAMPLE REC., DUP. % REC., RPD. Rows include 2,4-D, 2,4,5-TP, 2,4,5-T, and DINOSEB.

% Recovery = (Spike Sample Result - Sample Result) / Spike Concentration X 100

RPD (Relative % Difference) = (Spiked Sample Result - Duplicate Spike Sample Result) / Average of Spiked Sample X 100



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217601

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-1 @ 4
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/23/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS <5.0
HYDROCARBON RANGE -
HYDROCARBONS QUANTITATED USING -



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217602

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-1 @ 8
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/23/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS

<5.0

HYDROCARBON RANGE

-

HYDROCARBONS QUANTITATED USING

-



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217603

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-2 @ 9
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/23/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS

<5.0

HYDROCARBON RANGE

-

HYDROCARBONS QUANTITATED USING

-



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217604

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-2 @ 14 1/2
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/23/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS

<5.0

HYDROCARBON RANGE

-

HYDROCARBONS QUANTITATED USING

-



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217605

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-3 @ 9
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/23/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS
HYDROCARBON RANGE
HYDROCARBONS QUANTITATED USING

<5.0

-

-



Analytical **Technologies**, Inc.

GAS CHROMATOGRAPHY - RESULTS

ATI I.D. : 91217606

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
CLIENT I.D. : EB-3 @ 14 1/2
SAMPLE MATRIX : SOIL

DATE SAMPLED : 12/12/89
DATE RECEIVED : 12/13/89
DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/26/89
UNITS : MG/KG
DILUTION FACTOR : 1

COMPOUNDS

RESULTS

FUEL HYDROCARBONS <5.0
HYDROCARBON RANGE -
HYDROCARBONS QUANTITATED USING -



QUALITY CONTROL DATA

ATI I.D. : 912176

TEST : MOD EPA 8015-CDOHS (FUEL HYDROCARBONS)

CLIENT : ROBERT PRATER ASSOC.
PROJECT # : 349-18
PROJECT NAME : SCRIPPS-CHULA VISTA
REF I.D. : 91217701

DATE EXTRACTED : 12/13/89
DATE ANALYZED : 12/14/89
SAMPLE MATRIX : SOIL
UNITS : MG/KG

Table with 8 columns: COMPOUNDS, SAMPLE CONC. RESULT, SPIKED SPIKED, % SPIKED REC., DUP. SAMPLE REC., DUP. SAMPLE REC., RPD. Row 1: FUEL HYDROCARBONS, <5.0, 500, 390, 78, 400, 80, 2

% Recovery = (Spike Sample Result - Sample Result) / Spike Concentration X 100

RPD (Relative % Difference) = (Spiked Sample Result - Duplicate Spike Sample Result) / Average of Spiked Sample X 100



ATI Analytical Technologies, Inc.
5550 Morehouse Drive • San Diego, CA 92121-1709

Chain of Custody

DATE: _____ PAGE: _____ OF _____

PROJECT MANAGER: Larry Jensen
COMPANY: Robert Water Assoc.
ADDRESS: 10505 Roselle St.
 50 92121

BILL TO: Same
COMPANY: Same
ADDRESS: Same

70 Morehouse PHONE NUMBER: 619 453-5605
SAMPLERS: (Signature)

SAMPLE ID	DATE	TIME	MATRIX	LAB ID
EB-1 @ 4	12-12-89	8:35	soil	01
EB-1 @ 8	12-12-89	8:50		02
EB-2 @ 89		9:30		03
EB-2 @ 14 1/2		9:45		04
EB-3 @ 89		12:40		05
EB-3 @ 14 1/2		10:55		06
EB-2 @ 2A	12-11-89	9:15		07
EB-5 @ 2 1/2 A	12-12-89	1:00		08

Recommended Quantity and Preservative (Provide triple volume on QC Samples)

Sample Type	Volume	Preservative	Number of Containers
Petroleum Hydrocarbons 418.1	1L	H ₂ SO ₄ /100g	
Oil and Grease 413.2	1L	H ₂ SO ₄ /100g	
Gasoline (MOD 8015/DOHS)	4 oz	(HCl)/50g	
Diesel (MOD 8015/DOHS)	4 oz	(HCl)/50g	
Gasoline/BTXE (MOD 8015/8020)	4 oz	(HCl)/50g	
PerDistillates (C6-C25, MOD 8015)	4 oz	(HCl)/50g	
BTXE (8020)	2X40ml	(HCl)/50g	
Chlorinated Hydrocarbons (8010)	2X40ml	(HCl)/50g	
Aromatic Hydrocarbons (8020)	2X40ml	(HCl)/50g	
Chlorinated/Aromatic Hydrocarbons (8010/8020)	2X40ml	(HCl)/50g	
Organic Pb	500ml/50g		
Pesticides/PCB (8080)	1L/50g		
Base/NEU/Acid Cmps	1L/100g		
GC/MS (8270)	1L/100g		
Volatile Cmps GC/MS (8240)	2X40ml	(HCl)/100g	
Polynuclear Aromatic (8310)	1L/100g		
CCR Metals	500ml/100g		
Priority Pollutant Metals	500ml/100g		8150

PROJECT INFORMATION	SAMPLE RECEIPT	RELINQUISHED BY: 1	RELINQUISHED BY: 2	RELINQUISHED BY: 3
PROJECT NUMBER: 349-18	TOTAL NUMBER OF CONTAINERS: 8	Signature: [Signature]	Signature: [Signature]	Signature: [Signature]
PROJECT NAME: Scripps - Chula Vista	CHAIN OF CUSTODY SEALS: Y/N/A	Time: 9:00	Time: [Time]	Time: [Time]
PURCHASE ORDER NUMBER:	INTACT? Y/N/A	Date: 12-13-89	Date: [Date]	Date: [Date]
VIA:	RECEIVED GOOD COND./COLD	Company: F.O. Morehouse	Company: [Company]	Company: [Company]
TAT: <input type="checkbox"/> 24HR <input type="checkbox"/> 48 HRS <input type="checkbox"/> 1 WK <input checked="" type="checkbox"/> 2 WKS	LAB NUMBER: 918176	RECEIVED BY: 1	RECEIVED BY: 2	RECEIVED BY: 3
SAMPLE DISPOSAL INSTRUCTIONS				
<input checked="" type="checkbox"/> ATI Disposal @ \$5.00 each <input type="checkbox"/> Return <input type="checkbox"/> Pickup (will call)				
Comments:				

APPENDIX C
CHAIN-OF-TITLE REPORT

No.

1156618

CHAIN OF TITLE GUARANTEE

The assurances referred to on the face page are:

That, according to those public records which, under the recording laws, impart constructive notice of matters relating to the interest, if any, which was (acquired) ~~RESERVED~~ by Vaselious A. Mpenekos, a widower

pursuant to a Deed

in and to the land described as follows: That portion of the West half of 10 Acre Lots 13 and 14 in Quarter Section 148 of CHULA VISTA, in the City of Chula Vista, County of San Diego, State of California, according to the Map thereof No. 505, filed in the Office of the County Recorder of San Diego County, on March 13, 1888. (Assessors Parcel Number 568-370-47)

Only the following ~~matters~~ ^{deeds and leases} appear in such records subsequent to November 1, 1949.

Item 1: QC Deed

- Grantor: Carmelita Mpenekos
- Grantee: William A. Benekos
- Recorded: 6-1-55 #71217 Book 5663 page 586 Official Records

Item 2: QC Deed

- Grantor: Vaselious A. Mpenekos
- Grantee: William A. Benekos
- Recorded: 6-1-55 #71218 Book 5663 page 588 Official Records

This Guarantee does not cover:

1. Taxes, assessments and matters related thereto.
2. Instruments, proceedings or other matters which do not specifically describe said land.

Item 3: Lease Agreement

- Lessor: William A. Benekos, aka Vasilios Mpenekos, an unmarried man
- Lessee: Donald K. McCredie, as Trustee for Donald P. Mc Credie, Todd C. Mc Credie, Kathleen D. Mc Credie, Scott A. Mc Credie, and Karen A. Mc Credie, an undivided one-third; James P. Peltier and Margie L. Peltier, husband and wife an undivided one-third; and Walter Wencke, as Trustee of Wenda Kay Wencke and Wayne Karl Wencke, an undivided one-third
- Recorded: 9-21-65 #170854

Item 4: Amendment to Lease Agreement

- Lessor: William A. Benekos, aka Vasilios Mpenekos, an unmarried man
- Lessee: Donald K. Mc Credie, as Trustee for Donald P. Mc Credie, Todd C. Mc Credie, Kathleen D. Mc Credie and Karen A. McCredie, an undivided one-third; and James P. Peltier and Margie L. Peltier husband and wife, an undivided one-third, and Walter Wencke, Trustee for Wenda Kay Wencke and Wayne Karl Wencke, an undivided one-third
- Recorded: 5-26-67 #75370

Item 5: Short Form Sublease

- Lessor: Donald K. Mc Credie, as Trustee for Donald P. Mc Credie, Todd C. Mc Credie, Kathleen D. Mc Credie, Scott A. Mc Credie, and Karen A. Mc Credie, as to an undivided one-third interest; and James P. Peltier and Margie L. Peltier, husband and wife as to an undivided one-third interest; and Walter Wencke as Trustee for Wenda Kay Wencke and Wayne Karl Wencke, as to an undivided one-third interest.
- Lessee: K.K.S. Corporation, a Missouri Corporation
- Recorded: 4-26-68 #70348

Item 6: Lease

- Lessor: K.K.S. Corporation
- Lessee: Albert Krivy, Margaret (Glavan) Krivy, et al
- Recorded: 5-25-70 #90135
- Please see attached document for particulars

Item 7: Short Form Sublease

- Lessor: K. K. S. Corporation, a Missouri Corporation
- Lessee: Albert Krivy, Margaret (Glovan) Krivy, John Zavrski, Carol Ann Zavrski, W. C. Gilbert Jr., Doris Gilbert, Oliver Lund, Mary L. Lund, John C. Ortman, Ann Ortman, James M. Magot, and Janet M. Magot
- Recorded: 9-28-70 #176302

Item 8: Amended Memorandum
of Lease

- Lessor: Donald K. Mc Credie, as Trustee for Donald P. Mc Credie, Todd C. Mc Credie, et al
- Lessee: United California Bank
- Recorded: 12-22-70 #234477
- Please see attached Item 8 for particulars

Item 9: Sherrif's Deed

- Grantor: John F. Duffy, Sheriff of the County of San Diego
- Grantee: Phil L. Wood
- Recorded: 6-25-79 #263192

Item 10: Memorandum
of Lease

- Lessor: Chula Vista Properties, a partnership
- Lessee: San Diego RTM, Inc., a California corporation
- Recorded: 7-31-80 #242655

Item 11: QC Deed

- Grantor: James P. Peltier and Margie L. Peltier, as to an undivided one-third interest
- Grantee: James Paul Peltier and Margie Robertson Peltier, Co-Trustees UTD December 4, 1980
- Recorded: 12-8-80 #412522
- Please see attached Item 11 for particulars

Item 12: Order Confirming Sale
of Real Property

- Estate of: William Benekos aka Vasilios Mpenekos
- Case No. 125852
- Recorded: 6-3-83 #186821

Item 13: Executor's Deed

- Grantor: California First Bank, as Executor of the Estate of William Benekos who acquired title as William A. Benekos aka Vasilios Mpenekos, deceased
- Grantee: James P. Peltier and Margie R. Peltier, as Trustees for Castle AMC Profit Sharing Plan
- Recorded: 6-3-83 #186822

Item 14: Assignment of Lease

- Recorded: 6-3-83 #186823
- Please see attached Item 14 for particulars

Item 15: Grant Deed

- Grantor: James P. Peltier and Margie R. Peltier, as Trustees for Castle AMC Profit Sharing Plan
- Grantee: James P. Peltier and Margie R. Peltier, as Trustees for Castle AMC Profit Sharing Plan, an undivided one-third interest and to Garrett Ltd., a California Limited Partnership, an undivided two-thirds interest, as tenants in common.
- Recorded: 6-3-83 #186824

Item 16: Assignment of Lease

- Recorded: 6-3-83 #186825
- Please see attached Item 16 for particulars

Item 17: QC Deed

- Grantor: Wayne Karl Wencke, as Successor Trustee for Wenda Kay Wencke and Wayne Karl Wenke
- Grantee: James P. Peltier and Margie R. Peltier, as Trustees for Castle AMC Profit Sharing Plan
- Recorded: 6-3-83 #186826

Item 18: QC Deed

- Grantor: Donadl K. Mc Credie, as Trustee for Donald F. Mc Credie Todd C. Mc Credie, Kathleen D. Mc Credie, Scott A. Mc Credie, and Karen A. Mc Credie
- Grantee: James P. Peltier and Margie R. Peltier, as Trustees for Castle AMC Profit Sharing Plan
- Recorded: 6-3-83 #186827

Item 19: Individual
Grant Deed

- Grantor: James P. Peltier and Margie R. Peltier as Trustees for Castle AMC Profit Sharing Plan
- Grantee: Garrett Ltd., a California Limited Partnership, an undivided one-sixth interest
- Recorded: 3-11-86 #93426

Item 20: Individual
Grant Deed

- Grantor: James P. Peltier and Margie P. Peltier, as Trustees for Castle AMC Profit Sharing Plan
- Grantee: William J. Maxam, as Trustee of the Casey Lurel Exchange Trust Dated December 30, 1985, an undivided one-sixth interest
- Recorded: 3-11-86 #93427

Item 21: QC Deed

- Grantor: William J. Maxam as Trustee of the Casey Lurel Exchange/
Fund.
- Grantee: David S. Casey Sr., a married man, as his sole and separate property, as to an undivided one-sixth interest
- Recorded: 3-11-86 #93428

Item 22: QC Deed

- Grantor: Margaret H. Casey, a married woman
- Grantee: David S. Casey, Sr., a married man, as his sole and separate property as to an undivided one-sixth interest
- Recorded: 3-11-86 #93429

Item 23: Assignment of Lease

- Recorded: 3-11-86 #93430
- Please see attached Item 23 for particulars

Item 24: Individual Grant Deed

- Grantor: Garrett, Ltd., a California Limited Partnership
- Grantee: Arpple, Inc., a California corporation an undivided one-sixth interest
- Recorded: 1-15-87 #21484

Item 25: Assignment of Lease

- Recorded: 1-15-87 #21485
- Please see attached Item 25 for particulars

Item 26: Individual
Grant Deed

- Grantor: Arpple, Inc., a California Corporation
- Grantee: Wayne P. Lill, a married man as his sole and separate property, an undivided one-eighteenth interest
- Recorded: 1-15-87 #21486

Item 27: Assignment of Lease

- Recorded: 1-15-87 #21487
- Please see attached Item 27 for particulars

Item 28: Individual
Grant Deed

- Grantor: Arpple, Inc., a California Corporation
- Grantee: Metropolitan Shopping Square, Ltd., a California Limited Partnership, an undivided one-ninth interest
- Recorded: 1-15-87 #21488

Item 29: Assignment of Lease

- Recorded: 1-15-87 #21489
- Please see attached Item 29 for particulars

APPENDIX E
INFECTIOUS WASTE CONTROL PROGRAM

REVISED: 10/89
REVIEWED: 6/86, 11/88

BIO MEDICAL WASTE
HANDLING AND DISPOSAL

SCRIPPS MEMORIAL HOSPITALS

INFECTION CONTROL MANUAL Page 1 of 3

I. MEDICAL SOLID WASTE

1. Trash can with brown impervious plastic bag is used.
2. Emptied every shift by housekeeper.
3. Pick-up by janitor every shift.
4. Compacted and stored in a 16 cubic yard compactor/container.
5. Pick-up 2 - 3 times a week by Chula Vista Sanitation Company. The company sanitizes the container monthly or as needed prior to return of compactor to Scripps Memorial Hospital.

II. POLICY FOR BIOHAZARDOUS WASTE

1. All bags used are red plastic marked "Biohazard" or "Infectious Waste".
2. Storage area will be at a fenced area to prevent access by unauthorized persons.
3. Warning signs posted with the following inscription, "CAUTION - INFECTIOUS WASTE STORAGE AREA - UNAUTHORIZED PERSONS KEEP OUT". "CUIDADO ZONA DE RESIDUOS INFECTADOS - PROHIBIDA LA ENTRADA A PERSONAS NO AUTHORIZADAS".
4. Re-usable plastic containers for infectious waste shall be thoroughly washed and decontaminated by approved methods by BFI Medical Waste System.
5. Infectious sharps/needles
 - A. All needles, syringes and other sharps are contained in leakproof, rigid, puncture resistant container.
 - B. When full, plastic container is locked, taped with red tape marked "Infectious Waste/Sharps" and placed next to regular trash can in the utility room.
 - C. Plastic container is picked up by Janitor and placed in barrels marked Biohazardous/Infectious Waste in fenced storage area
 - D. BFI Medical Waste pick up 3 X a week.

REVISÉD: 10/89
REVIEWÉD: 6/86, 11/88

BIO MEDICAL WASTE
HANDLING AND DISPOSAL

SCRIPPS MEMORIAL HOSPITALS

INFÉCTION CONTROL MANUAL PAGE 2 OF

6. Laboratory Waste

- A. All laboratory waste (culture plates, tubes, etc.) will be placed in a container with a red plastic bag, marked "Biohazard"
- B. The laboratory waste is collected three (3) times a day in another red plastic bag, by housekeeping.
- C. It is stored in a plastic 35 gallon drum marked "Biohazard". It is picked up 6X a week by BFI Medical Waste System.

7. Anatomical Remains/Tissues

A. Placenta

- 1) Delivery room personnel will place placenta in two (2) medium brown plastic bags with addressograph label and date and put it in a bucket lined with a red bag.
- 2) At the end of each shift, housekeeping will tie the plastic bag containing several bags of placenta. Date the bag and bring it to the morgue and refrigerator marked for placentas.
- 3) Placentas will be picked-up 6 X a week by BFI Medical Waste System, in barrels marked "Infectious Waste".

B. Surgical Specimens

- 1) Specimens fixed in formalin are saved for two (2) weeks in the Pathology Department. After two (2) weeks, the formalin is discarded and the tissue is double-bagged (red bags) and placed in the morgue refrigerator.
- 2) Pick-up by BFI Medical Waste System is 3 X a week with other anatomical remains.

REVISED: 10/89
REVIEWED: 6/86, 11/88

BIO MEDICAL WASTE
HANDLING AND DISPOSAL

SCRIPPS MEMORIAL HOSPITALS

INFECTION CONTROL MANUAL PAGE 3 OF 3

8. Chemotherapy Waste

A. Pharmacy

- 1) Needles, vials, syringes placed in a rigid leak-proof, covered plastic container marked "CHEMOTHERAPY" which is placed inside the hood.
- 2) Gowns, gloves, paper products, etc. placed in a double bagged chemotherapy hamper.
- 3) Picked up by janitor and placed in covered barrels marked "Biohazard" in storage area.

B. Nursing Units

- 1) Needles, I.V. bags, vials, etc. are collected in rigid leak-proof, tight fitting container marked "CHEMOTHERAPY".
- 2) Picked up by janitor and placed in covered barrels marked "Biohazard" in storage area.
- 3) BFI Medical Waste System pick up containers 3x a week. Cleaned barrels are returned to Scripps Memorial Hospital.

FORMULATED: 7/86 REVISED: 8/90 REVIEWED: 7/87,10/89	SUBJECT: INFECTIOUS WASTE SPILL CLEAN UP
SCRIPPS MEMORIAL HOSPITALS	INFECTION CONTROL MANUAL PAGE 1 OF 1

PURPOSE: To protect personnel and others from exposure to infectious waste.

PROCEDURE:

In the event of the Infectious bags (red) bursting and spilling infectious waste, the housekeeping personnel are responsible in doing the following:

1. Place "CAUTION" sign near the spill area.
2. Put on gloves, mask, goggles, if splashing likely, and gown, (if soiling of clothing is likely).
3. Obtain 2 red plastic bags.
4. With gloved hands, transfer spilled material into red plastic bag, being careful not to contaminate outside of bag.
5. Remove gloves and place inside red bag before tying.
6. Mop floor with germicidal solution. Discard mop head in red bag.
7. Remove mask and gown and place in regular trash.
8. Wash hands.
9. Make a Q.A. report.

APPENDIX F
GEOTECHNICAL ANALYSIS

GEOTECHNICAL INVESTIGATION

For

SCRIPPS MEMORIAL HOSPITAL EXPANSION
PHASE I
Fifth Avenue and H Street
Chula Vista, California

To

SCRIPPS MEMORIAL HOSPITAL
P. O. Box 28
La Jolla, California 92038

APRIL 1991

ROBERT PRATER ASSOCIATES
Consulting Soil, Foundation & Geological Engineers

Robert R. Prater, C.E. 1942-1980
Wm. David Hespeler, C.E.

April 1, 1991
349-18B, 91-146

Scripps Memorial Hospital
P. O. Box 28
La Jolla, California 92038

Attention: Mr. Bruce Heimbach, Office of Director of Facilities Development

Re: Geotechnical Investigation
Scripps Memorial Hospital Expansion - Phase I
Fifth Avenue and H Street
Chula Vista, California
SMH Job No. 88-0311-A

Gentlemen:

In accordance with your request we have performed a geotechnical investigation for the subject project. The accompanying report presents the results of our field investigation, laboratory tests, and engineering analysis. The soil, foundation and geologic conditions are discussed and recommendations for the soil and foundation engineering aspects of the project are presented.

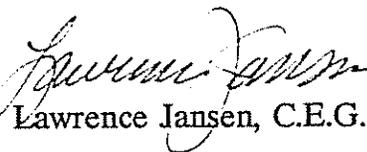
If you have any questions concerning our findings, please call.

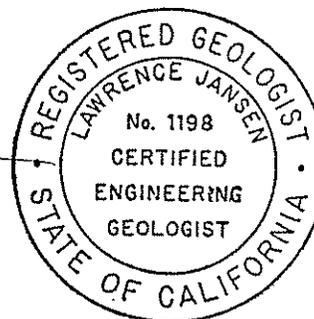
Very truly yours,

ROBERT PRATER ASSOCIATES


Wm. D. Hespeler, G.E.




Lawrence Jansen, C.E.G.



WDH/LJ:ls

Copies: Addressee (2)

James Leary Architecture and Planning, Attn: Mr. James Leary (6)

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GEOTECHNICAL INVESTIGATION

FOR

SCRIPPS MEMORIAL HOSPITAL EXPANSION - PHASE I FIFTH AVENUE AND H STREET CHULA VISTA, CALIFORNIA

INTRODUCTION

In this report we present the results of our geotechnical investigation for the subject project located just west of the existing hospital complex at 435 H Street in Chula Vista, California. The purpose of the geotechnical investigation was to evaluate the subsurface soil and geologic conditions at the site and to provide recommendations concerning the soil, foundation and geologic engineering aspects of the project.

It is our understanding that the proposed hospital expansion building (Phase I) will be a three-story structure above grade with one partially subterranean basement level. We anticipate that the proposed structure will be of steel-frame and/or reinforced concrete construction. Maximum combined dead plus live column loads are estimated to be on the order of 300 kips per square foot. The planned finish first floor elevation is about 66½ feet and the planned finish basement floor elevation is about 53 feet. From existing grades, the basement excavation will require cuts up to about 10 feet deep. Grading around the perimeter of the building will include fills up to about 6 feet in height.

SCOPE

The scope of work performed in this investigation included a review of pertinent published geotechnical literature, a review of older topographic maps and aerial photographs of the site, a site reconnaissance by our engineering geologist, subsurface exploration, laboratory testing, engineering analysis of the field and laboratory data, and the preparation of this report. The data obtained and the analyses performed were for the purpose of providing design and construction criteria for the geotechnical engineering aspects of site development.

SITE CONDITIONS

A. Surface

The subject site is situated in the coastal plains province of San Diego County roughly one mile east of the San Diego Bay (see Vicinity Map, Figure 1). The property is located on a very flat-lying ancient marine wave-cut platform known as the Chula Vista Terrace. The natural drainage in the area is poorly developed, generally flowing from east to west. Major drainage courses in the vicinity of the site include the Sweetwater Valley to the north and Telegraph Canyon to the south. No evidence of old swales or other pronounced depressions was evident on the site from old topographic maps or aerial photographs.

The proposed hospital expansion building site is located along the eastern margin of the hospital expansion property (see Site Plan, Figure 2). The expansion property is currently occupied by an older shopping center complex and is essentially flat-lying with elevations ranging from 59 to 62 feet across the building area. An existing retaining wall up to about 6 feet high roughly coincides with the eastern wall at the proposed building and separates the lower existing hospital property from the proposed expansion property. Existing wall backfill soils are most likely present behind the retaining wall.

A portion of the proposed building site is currently occupied by a single-story masonry block structure associated with the existing shopping center complex. The remainder of the proposed building site is occupied by asphalt concrete paved parking and drives with scattered landscape islands. Several underground utilities are present across the site.

B. Subsurface

A subsurface investigation was performed using a truck-mounted, continuous-flight auger drill to investigate and sample the subsurface soils. Eight exploratory borings were drilled on March 13 through 15, 1991 to a maximum depth of 30 feet at the approximate locations shown on the Site Plan, Figure 2. Logs of the borings and details regarding the field investigation are presented in Appendix A. Details of the laboratory testing and the laboratory test results are presented in Appendix B.

In general, the proposed hospital expansion building site is underlain by shallow existing fill and/or topsoil overlying sandy and clayey formational terrace deposits. Loose clayey sand and soft sandy clay fill soils were encountered in Borings 5 and 6, respectively, to a depth of 1½ feet. Soft sandy clay topsoil was encountered in Borings 1 and 3 to a depth of 1½ feet. In Boring 7, stiff sandy clay and medium dense clayey sand residual soils were encountered to a depth of 5 feet. The materials encountered underlying the near surface fill, topsoil and residuum consisted of very stiff sandy clay and medium dense to dense clayey to silty sand formational terrace deposits to the maximum depth explored of 30 feet. In Borings 2, 4, and 8, very stiff sandy clay and medium dense to dense clayey sand terrace deposits were encountered from just below the existing pavement to the maximum depth explored of 30 feet. Medium dense silty to poorly graded, friable sand was encountered in Boring 1 from a depth of 25 feet to the maximum depth explored and in Boring 5 between depths of 4 to 11½ feet. Based on our laboratory testing and experience with similar soils in the vicinity the more clayey topsoil and terrace deposits have a medium and high potential for expansion, respectively. The more sandy terrace deposits have a low potential for expansion.

The boring logs and related information depict subsurface conditions only at the specific locations shown on the site plan and on the particular dates designated on the logs. Subsurface conditions at other locations may differ from conditions occurring at these boring locations. Also, the passage of time may result in changes in the subsurface conditions due to environmental changes.

C. Geologic Setting

The results of our subsurface exploration, as well as review of published geotechnical literature, indicates the site is underlain by relatively shallow artificial fill and topsoils which overlie formational terrace deposits of the Bay Point Formation (see Regional Geologic

Map, Figure 3). The Bay Point Formation is typically comprised of marine and non-marine, medium dense, silty and clayey sandstone deposited during the late Pleistocene epoch ($120,000 \pm 10,000$ years before present). Occasional beds of stiff to very stiff sandy and silty clay also exist. In addition, poorly-cemented, friable sand lenses occur within this formation.

The geologic structure beneath the site and vicinity is characterized by relatively flat-lying deposits of the Bay Point Formation. The regional dip of bedding is typically 3 to 5 degrees to the west. The Bay Point Formation unconformably caps the older Pliocene age San Diego Formation or other Tertiary age formations at depth. There are no faults known to pass through the site. The closest regionally mapped faulting in the vicinity includes faults within the La Nacion fault zone approximately $1\frac{1}{2}$ miles to the east. The La Nacion fault zone is considered to form the eastern boundary of a north-south trending graben which is centered in the San Diego Bay region.

D. Ground Water

Free ground water was not encountered in any of the exploratory borings drilled at the site and no surface seeps were observed. Based on the topography and elevation of the property and the proximity to the San Diego Bay we anticipate the depth to ground water to be on the order of 50 feet. Ground-water seepage, perched ground water, and/or wet soil conditions may be encountered, however, within landscaped areas on-site. It must be noted that fluctuations in the level of ground water may occur due to variations in ground surface topography, subsurface stratification, rainfall, irrigation practices and other possible factors which may not have been evident at the time of our field investigation.

E. Seismic Considerations

The San Diego area is considered by geologists and seismologists to have a low to moderate seismic rating. Based on our review of some available published information including the County of San Diego Faults and Epicenters Map, there are no active or potentially active faults known to pass through the site. The prominent fault zones generally considered to have the most potential for earthquake damage in the vicinity of the site are the active Elsinore and San Jacinto fault zones mapped approximately 43 and 64 miles northeast of the site and active offshore faults including the Coronado Bank fault zone approximately 14 miles southwest of the site (see Regional Fault Location Map, Figure 4). Local faulting of significance includes the Rose Canyon fault zone and the La Nacion fault zone. The Rose Canyon fault zone has been suggested to trend beneath the San Diego Bay area approximately $4\frac{1}{2}$ miles southwest of the property. The La Nacion fault zone is mapped approximately $1\frac{1}{2}$ miles east of the site (see Local Fault Map, Figure 5).

Historically, the Rose Canyon and La Nacion fault zones as well as the San Diego area, in general, have been characterized by very low seismicity. The Rose Canyon fault previously has not been classified as "active" by California Division of Mines and Geology (CDMG). Recent geologic evidence, however, indicates that portions of the Rose Canyon fault zone have moved within the Holocene epoch (last 10,000 years). According to the CDMG this defines the Rose Canyon fault as active. The geologic structure and seismicity of the Rose Canyon fault zone are still not well understood. It can generally be said, however, that this fault system has a much lower degree of activity than the more distant active faults east and west of the San Diego metropolitan area.

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The La Nacion fault zone is comprised of a zone of complex en echelon moderate to high angle normal fault breaks that trend north-northwesterly roughly 16 miles from near the USA-Mexico border. The major fault strands within this zone include the Sweetwater and La Nacion faults. Faulted sediments within the La Nacion fault zone include Tertiary and late Quaternary age materials. Evidence of recent activity along the La Nacion fault zone has not been confirmed to date and this fault zone is considered "potentially active".

Other local faults known to exist in the vicinity include the Chula Vista and Telegraph Canyon faults. The Chula Vista fault was discovered roughly 2,000 feet east of the site during an excavation for the South Bay Regional Center in 1980 near Third Avenue and H Street. The fault offsets the Quaternary age Bay Point Formation and is considered potentially active (Elliot, 1980). The Telegraph Canyon fault has been inferred approximately one mile southwest of the site trending east-west beneath the San Diego Bay (Chula Vista Seismic Safety Element, 1974).

Although research on earthquake prediction has greatly increased in recent years, geologists and seismologists have not yet reached the point where they can predict when and where an earthquake will occur. Nevertheless, on the basis of current technology, it is reasonable to assume that the subject site will be subject to the effects of at least one moderate to large earthquake. During such an earthquake, the danger from fault offset through the site is remote, but strong ground shaking is likely to occur.

Based on our review of available published information, it is our opinion that the earthquake magnitudes included in the following table are applicable to the site. The bedrock accelerations corresponding to the earthquake magnitudes and distances contained in this table were computed utilizing the methods presented by Seed and Idriss, 1982.

Estimated Fault Activity and Site Bedrock Accelerations

<u>Fault</u>	<u>Distance From Site (miles)</u>	<u>Maximum Credible Earthquake (Richter Magnitude)</u>	<u>Maximum Credible Bedrock Acceleration</u>	<u>Maximum Probable Earthquake (Richter Magnitude)</u>	<u>Maximum Probable Bedrock Acceleration</u>
Elsinore	43	7-1/2	0.12	7-1/4	0.10
San Jacinto	64	7-3/4	0.08	7-3/4	0.08
La Nacion	1-1/2	6-1/2	0.65	6	0.55
Rose Canyon	4-1/2	6-3/4	0.48	6-1/4	0.41
Coronado Bank	14	7	0.30	6-1/4	0.27

EVALUATION AND CONCLUSIONS - GEOLOGIC HAZARDS

Based on the results of our investigation, it is our opinion that, from a geologic hazards standpoint, the site is suitable for the proposed construction. Geologic hazards at the site would be most critical during strong earthquakes and can be divided into two general categories: 1) fault offset hazards and 2) shaking hazards. Detailed discussions of these hazards with respect to the site are presented below.

A. Fault Offset Hazard

Based on available published information and our site investigation work, no known faults cross the site. Therefore, the potential hazard resulting from surface rupture or fault offset is considered extremely remote at the site.

B. Shaking Hazards

During a major earthquake, strong ground shaking of the site will probably occur. Strong ground shaking not only can cause structures to shake, but it can also induce other phenomena that may directly cause substantial ground movements resulting in damage to structures. These phenomena include soil liquefaction, seismically induced waves such as tsunamis and seiches, inundation due to dam or embankment failure, landsliding, lateral spreading, differential compaction, and ground cracking. Our analyses indicate that the location of the site and the subsurface soil conditions are not conducive to any of these phenomena as is discussed in the following paragraphs.

1. Soil Liquefaction

Due to the generally medium dense to dense nature of the sandy on-site materials and the depth to ground water of about 50 feet, the liquefaction potential of the on-site materials on which the proposed structure will be founded is considered to be non-existent.

2. Seismically Induced Waves

A tsunami is a high ocean wave generated by a submarine earthquake or volcanic eruption. The San Diego Region has felt the effects of seismically induced sea waves in the past. In the 92 years of tide gauge records at San Diego, at least 19 tsunamis have been recorded; most being only a few tenths of a meter in height. The largest had a peak-to-trough range of 1.5 meters (Agnew, 1979). Since the largest wave thus far recorded would only inundate the low-lying water-front area and because the site is located in excess of one mile inland at a ground surface elevation of about 60 feet above Mean Sea Level, the possibility of the site being affected by a tsunami is considered extremely remote.

A seiche is an oscillating wave in an enclosed or restricted body of water generated by ground motion during an earthquake. Because the site is not located in close proximity to any restricted bodies of water, the possibility of the site being affected by a seiche is considered non-existent.

3. Inundation Due to Dam or Embankment Failures

There are no lakes or large water supply reservoirs located in the immediate vicinity or upgradient of the site. Therefore, at present, inundation of the site due to dam or embankment failure is also considered to be non-existent.

4. Landsliding

The areas in San Diego County where landslide hazards reportedly exist are along the steep hillsides underlain by Tertiary age claystones and mudstones. The site is located on essentially flat terrain and is therefore unaffected by potential landslide hazards.

5. Other Shaking Hazards

Because of the flat terrain of the site and the relatively dense condition of the underlying formational soils, the potential hazards due to earthquake induced differential compaction, lateral spreading, and lurch cracking are also considered to be remote.

CONCLUSIONS AND RECOMMENDATIONS - EARTHWORK AND FOUNDATIONS

From a geotechnical engineering standpoint, it is our opinion that the site is suitable for construction of the proposed hospital expansion building provided the conclusions and recommendations presented in this report are incorporated into the design and construction of the project.

The primary features of concern at the site is the high expansion potential of the more clayey terrace deposits. It appears that the more clayey terrace deposits will be locally exposed across portions of the finish subgrade for the basement floor slab. The planned finish basement floor elevation will be near adjacent finish grade along a portion of the eastern building limit. Accordingly, the more clayey terrace soils may be subject to moisture variations. In order to minimize possible damage to the basement floor slab resulting from swelling and shrinkage of the clayey materials in response to moisture changes, the basement floor slab must be supported on a layer of low-expansion potential soil.

Detailed earthwork and foundation recommendations are presented in the following paragraphs. The opinions, conclusions, and recommendations presented in this report are contingent upon Robert Prater Associates being retained to review the final plans and specifications as they are developed and to observe the site earthwork and installation of foundations.

A. Earthwork

1. Clearing and Stripping

The site should be cleared of all obstructions including the existing building, pavements, underground utilities, and any miscellaneous trash or debris that may be present at the time of construction. After clearing, the ground surface should be stripped of surface vegetation as well as associated root systems. Holes resulting from the removal of buried obstructions that extend below the proposed finished site grades should be cleared and backfilled with

suitable material compacted to the requirements given under Item A.7., "Compaction." Prior to any filling operations, the cleared and stripped materials should be disposed of off-site.

2. Treatment of Existing Fills and Soft Topsoils

The basement excavation will partially remove the existing fill and soft topsoil within the building limits. In order to provide suitable foundation support for the building and other proposed improvements outside the limits of the basement excavation, we recommend that all existing fill and soft topsoils that remain after the necessary site excavations have been made be removed and recompacted. The recompaction work should consist of a) removing all existing fill and soft topsoil down to firm natural ground, b) scarifying, moisture conditioning, and compacting the exposed natural subgrade soils, and c) replacing the fill material as compacted structural fill. The areal extent and depth required to remove the fills should be determined by our representative during the excavation work based on his examination of the soils being exposed. Any unsuitable materials (such as oversize rubble and/or organic matter) should be selectively removed as directed by our representative and disposed of off-site.

3. Excavation

Based on the results of the exploratory borings and our experience with similar soils, it is our opinion that the required site excavations can be accomplished utilizing ordinary heavy earthmoving equipment. The bidding contractors should not, however, be relieved of making their own independent evaluation of the excavatability of the on-site materials prior to submitting their bids.

4. Subgrade Preparation

After the site has been cleared and stripped, the exposed subgrade soil in those areas to receive fill, building improvements and/or pavements should be scarified to a depth of 8 inches, moisture conditioned, and compacted to the requirements of Item A.7., "Compaction." In areas where dense undisturbed formational soils are exposed at the subgrade surface, the subgrade need not be scarified and compacted.

5. Low-Expansion Potential Fill/Soil Layer

Because of the high expansion potential of the more clayey formational soils, we recommend that the basement floor slab and any adjoining exterior slabs-on-grade east of the basement be supported on an 18-inch minimum thickness of low-expansion potential soil. Where potentially expansive soil is exposed at or within 18 inches of the finish basement subgrade level, this will require that the soils be undercut and replaced with 18-inch thickness of compacted low-expansion potential on-site or imported sandy soil. In addition, in fill areas outside the perimeter of the basement the upper 18 inches of the finish subgrade soils should be a compacted low-expansion potential on-site or imported sandy soil. The suitability of soils for use beneath floor slabs should be determined by our representative in the field at the time of construction. The low-expansion potential soil layer should extend a minimum of 5 feet beyond the perimeter limits of any proposed adjoining exterior slabs-on-grade.

6. Materials for Fill

All on-site soils with an organic content of less than 3 percent by volume are in general suitable for reuse as fill except where low-expansion potential fill is required. Fill material should not contain rocks or lumps over 6 inches in greatest dimension and not more than 15 percent larger than 2-1/2 inches. Any required imported fill material should be a low-expansion potential (U.B.C. expansion index of 30 or less), granular soil with a plasticity index of 12 or less. No more than 25 percent of the fill should be larger than 1/4-inch. All materials for use as fill should be approved by our representative prior to filling.

7. Compaction

All structural fill should be compacted to a minimum degree of compaction of 90 percent based upon ASTM Test Designation D 1557-78. The upper 6 inches of subgrade soil beneath pavements should be compacted to a minimum degree of compaction of 95 percent just prior to placement of the aggregate base layer. Fill material should be spread and compacted in uniform horizontal lifts not exceeding 8 inches in uncompacted thickness. Before compaction begins, the fill should be brought to a water content that will permit proper compaction by either: 1) aerating the fill if it is too wet, or 2) moistening the fill with water if it is too dry. Each lift should be thoroughly mixed before compaction to ensure a uniform distribution of moisture.

8. Temporary Construction Slopes

Based on our subsurface investigation work, laboratory test results, and engineering analysis, temporary cut-slopes for construction of the proposed retaining walls should be safe against mass instability at an inclination of 1 (horizontal) to 1 (vertical). In the event clean sandy soils with low cohesion are exposed in temporary cuts (such as encountered in Boring 5 from 4 to 11 feet) flatter inclinations may be necessary. Some localized sloughing or ravelling of the soils exposed on the slopes, however, may occur. Since the stability of temporary construction slopes will depend largely on the contractor's activities and safety precautions (storage and equipment loadings near the tops of cut-slopes, surface drainage provisions, etc.) it should be the contractor's responsibility to establish and maintain all temporary construction slopes at a safe inclination appropriate to his methods of operation.

9. Permanent Slopes

We recommend that any required cut and fill slopes be constructed to an inclination no steeper than 2 (horizontal) to 1 (vertical). The project plans and specifications should contain all necessary design features and construction requirements to prevent erosion of the on-site soils both during and after construction. Slopes and other exposed ground surfaces should be appropriately planted with a protective ground cover.

Fill slopes should be constructed so as to assure that the recommended minimum degree of compaction is attained out to the finished slope face. This may be accomplished by "backrolling" with a sheepsfoot roller or other suitable equipment as the fill is raised. Placement of fill near the tops of slopes should be carried out in such a manner as to assure that loose, uncompacted soils are not sloughed over the tops and allowed to accumulate on the slope face.

10. Trench Backfill

Pipeline trenches should be backfilled with compacted fill. Backfill material should be placed in lift thicknesses appropriate to the type of compaction equipment utilized and compacted to a minimum degree of compaction of 90 percent by mechanical means. In pavement areas, that portion of the trench backfill within the pavement section should conform to the material and compaction requirements of the adjacent pavement section. Our experience has shown that backfills for even shallow, narrow trenches, such as for irrigation and electrical lines, which are not properly compacted can result in problems, particularly with respect to shallow ground water accumulation and migration.

In addition, where trenches are excavated beneath building pads or other areas where a low-expansion potential soil layer is required the trench backfill should maintain the integrity of the low-expansion potential soil layer.

11. Drainage

Positive surface gradients should be provided adjacent to the building, and roof gutters and downspouts should be installed so as to direct water away from foundations and slabs toward suitable discharge facilities. Ponding of surface water should not be allowed, especially adjacent to the building or on pavements.

12. Construction Observation

Variations in soil and geologic conditions are possible and may be encountered during construction. In order to permit correlation between the preliminary soil and geologic data and the actual conditions encountered during construction and so as to aid in evaluating conformance with the plans and specifications as originally contemplated, it is essential that we be retained to perform on-site review during the course of construction.

All earthwork should be performed under the observation of our representative to assure proper site preparation, selection of satisfactory fill materials, as well as placement and compaction of the fills. Sufficient notification prior to earthwork operations is essential to make certain that the work will be properly observed.

B. Foundations

1. Footings

We recommend that the proposed building be supported on conventional, individual-spread and/or continuous footing foundations bearing on undisturbed natural soil and/or well-compacted fill material. All footings should be founded at least 24 inches below the lowest adjacent finished grade. Footings located adjacent to the tops of slopes should be extended sufficiently deep so as to provide at least 8 feet of horizontal cover or 1-1/2 times the width of the footing, whichever is greater, between the slope face and outside edge of the footing at the footing bearing level. Footings located adjacent to utility trenches should have their bearing surfaces situated below an imaginary 1-1/2 to 1 plane projected upward from the bottom edge of the adjacent utility trench.

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At the recommended depths footings may be designed for allowable bearing pressures of 4,000 pounds per square foot (psf) for combined dead and live loads and 5,300 psf for all loads, including wind or seismic. The footings should, however, have a minimum width of 12 inches. All continuous footings should contain top and bottom reinforcement to provide structural continuity and to permit spanning of local irregularities. We recommend that a minimum of two No. 4 top and two No. 4 bottom reinforcing bars be provided in the footings. In order for us to offer an opinion whether the footings are founded on soils of sufficient load bearing capacity, it is essential that our representative inspect the footing excavations prior to the placement of reinforcing steel or concrete.

Settlements under building loads are expected to be within tolerable limits for the proposed structure. For footings designed in accordance with the recommendations presented in the preceding paragraphs we estimate that post-construction differential settlements between adjacent columns and/or walls should not exceed 1/4-inch in 25 feet.

2. Slabs-On-Grade

Concrete slabs-on-grade may be supported directly on low-expansion potential compacted fill soil and/or firm undisturbed low-expansion potential natural soil. Slab reinforcing as well as slab thicknesses should be designed in accordance with the anticipated use of and loading on the slab. As a minimum, however, we recommend that the slabs should have a minimum thickness of 4 inches and be reinforced with 6x6 - W1.4xW1.4 welded wire fabric to minimize hairline cracking of the slabs due to concrete shrinkage. The wire fabric should be supported on small concrete block chairs or equivalent prior to placement of concrete and not hooked into place in the slab. It has been our experience that hooking the wire fabric to lift it into position during placement of the concrete is not always effective and often results in the wire fabric being positioned at the bottom of the slab.

In areas where moisture-sensitive floor coverings are to be utilized and in other areas where floor dampness would be undesirable, we recommend that consideration be given to providing an impermeable membrane beneath the slabs. The membrane should be covered with 2 inches of sand (minimum sand equivalent of 30) to protect it during construction. The sand should be lightly moistened just prior to placing the concrete.

3. Basement Walls

Basement walls must be designed to resist lateral earth pressures and any additional lateral pressures caused by surcharge loads on the adjoining retained surface. We recommend that basement walls be designed for an equivalent fluid pressure of 40 pcf plus an additional uniform lateral pressure of 12H pounds per square foot where H = the height of backfill above the top of the wall footing in feet. Wherever walls will be subjected to surcharge loads, they should also be designed for an additional uniform lateral pressure equal to one-half the anticipated surcharge pressure.

The preceding design pressures assume that there is sufficient drainage behind the walls to prevent the build-up of hydrostatic pressures from surface water infiltration. Adequate drainage may be provided by means of weepholes with permeable filter material installed behind the walls or by means of a system of subdrains. (See Figure 6, "Typical Basement Wall Details").

Backfill placed behind the walls should be compacted to a minimum degree of compaction of 90 percent using light compaction equipment. If heavy equipment is used, the walls should be appropriately temporarily braced.

Basement walls should be supported on footing foundations designed in accordance with the recommendations presented previously under Item B.1., "Footings." Lateral load resistance for the walls can be developed in accordance with the recommendations presented under Item B.4., "Lateral Loads."

4. Lateral Loads

Lateral load resistance for the building supported on footing foundations may be developed in friction between the foundation bottoms and the supporting subgrade. An allowable friction coefficient of 0.25 is considered applicable. An additional allowable passive resistance equal to an equivalent fluid weight of 350 pounds per cubic foot acting against the foundations may be used in design provided the footings are poured neat against the adjacent undisturbed native soils and/or compacted fill materials. These lateral resistance values assume a level surface in front of the footing for a minimum distance of 3 times the embedment depth of the footing and any shear keys and are based on a factor of safety of 1.5.

C. Limitations

The recommendations presented in this report are specifically for the proposed construction of the Phase I hospital expansion building. Our office should be notified of any changes in the proposed development for further recommendations, if necessary, based on our review. As grading and foundation plans are developed we should be retained to review them for conformance to our recommendations. We also recommend that our office review any other plans which may affect the geotechnical conditions on-site such as landscaping, irrigation, plumbing, or other similar type plans. We should also be retained to review any future development plans including building additions in order to develop specific recommendations for proposed construction. Additional subsurface exploration could be required.

The conclusions and recommendations presented in this report are based on our evaluation of the subsurface materials encountered on-site, our understanding of the proposed development, and our general experience in the geotechnical field. If significant variations in the geotechnical conditions are encountered during construction our office should be consulted for further recommendations.

The satisfactory performance of the site is also dependent on proper maintenance. Proper maintenance includes, but is not limited to, providing and maintaining good drainage away from structures and slopes, establishing good vegetation cover on slopes, and avoiding excess irrigation.

Significant variations in geotechnical conditions may occur with the passage of time due to natural processes or the works of man on this or adjacent properties. In addition, changes in the state of the practice may occur as a result of legislation or the broadening of knowledge. Accordingly, the conclusions and recommendations presented in this report should be reviewed and updated, if necessary, after a period of two years.

Backfill placed behind the walls should be compacted to a minimum degree of compaction of 90 percent using light compaction equipment. If heavy equipment is used, the walls should be appropriately temporarily braced.

Basement walls should be supported on footing foundations designed in accordance with the recommendations presented previously under Item B.1., "Footings." Lateral load resistance for the walls can be developed in accordance with the recommendations presented under Item B.4., "Lateral Loads."

4. Lateral Loads

Lateral load resistance for the building supported on footing foundations may be developed in friction between the foundation bottoms and the supporting subgrade. An allowable friction coefficient of 0.25 is considered applicable. An additional allowable passive resistance equal to an equivalent fluid weight of 350 pounds per cubic foot acting against the foundations may be used in design provided the footings are poured neat against the adjacent undisturbed native soils and/or compacted fill materials. These lateral resistance values assume a level surface in front of the footing for a minimum distance of 3 times the embedment depth of the footing and any shear keys and are based on a factor of safety of 1.5.

C. Limitations

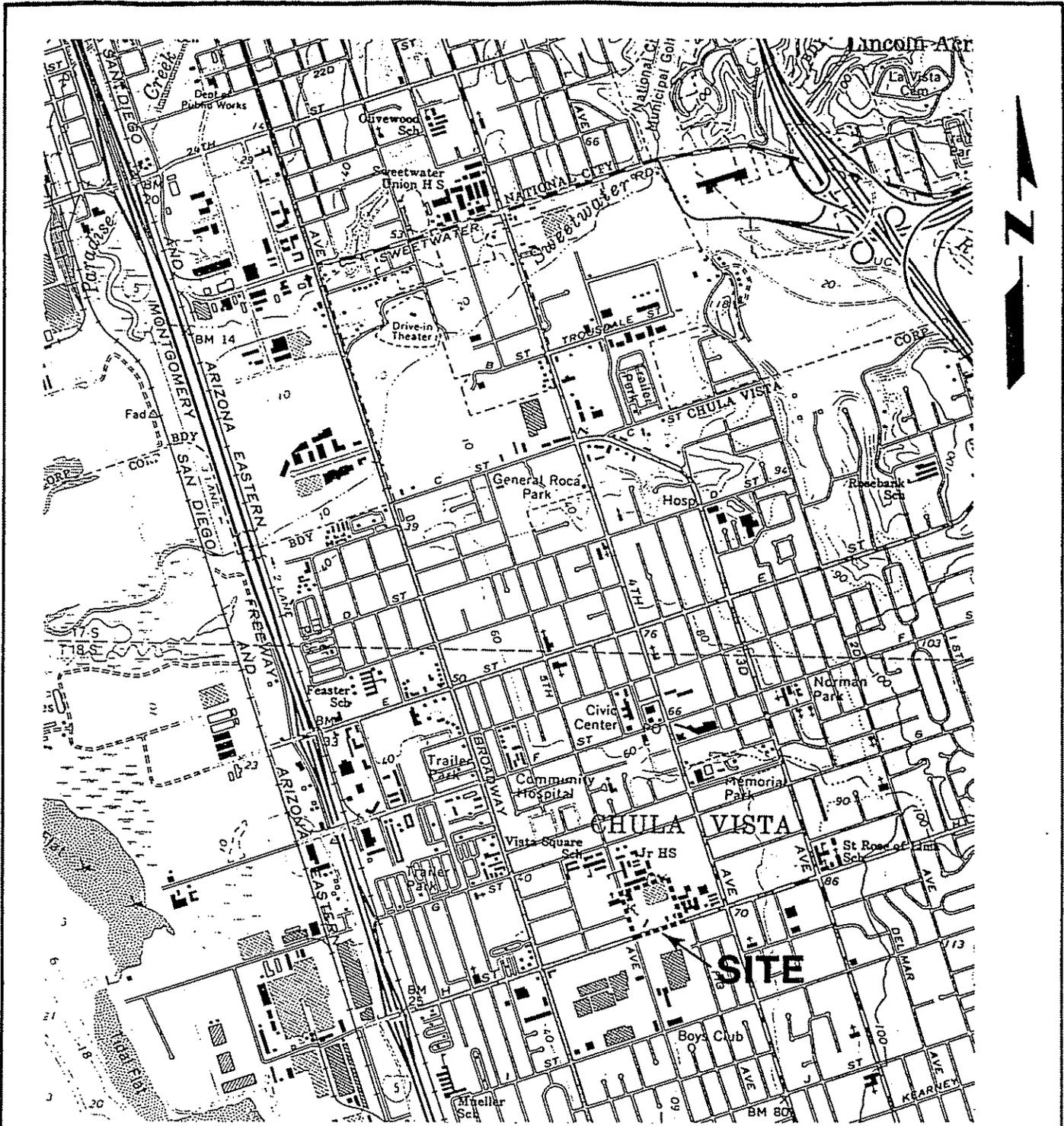
The recommendations presented in this report are specifically for the proposed construction of the Phase I hospital expansion building. Our office should be notified of any changes in the proposed development for further recommendations, if necessary, based on our review. As grading and foundation plans are developed we should be retained to review them for conformance to our recommendations. We also recommend that our office review any other plans which may affect the geotechnical conditions on-site such as landscaping, irrigation, plumbing, or other similar type plans. We should also be retained to review any future development plans including building additions in order to develop specific recommendations for proposed construction. Additional subsurface exploration could be required.

The conclusions and recommendations presented in this report are based on our evaluation of the subsurface materials encountered on-site, our understanding of the proposed development, and our general experience in the geotechnical field. If significant variations in the geotechnical conditions are encountered during construction our office should be consulted for further recommendations.

The satisfactory performance of the site is also dependent on proper maintenance. Proper maintenance includes, but is not limited to, providing and maintaining good drainage away from structures and slopes, establishing good vegetation cover on slopes, and avoiding excess irrigation.

Significant variations in geotechnical conditions may occur with the passage of time due to natural processes or the works of man on this or adjacent properties. In addition, changes in the state of the practice may occur as a result of legislation or the broadening of knowledge. Accordingly, the conclusions and recommendations presented in this report should be reviewed and updated, if necessary, after a period of two years.

Our services consist of professional opinions and recommendations made in accordance with generally accepted geotechnical engineering principles and practices. This warranty is in lieu of all other warranties either express or implied.



Approximate Scale (feet)



Base: A U.S.G.S. topographic map titled "National City, California," dated 1967, photorevised 1975.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	VICINITY MAP	
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California	
	PROJECT NO.	DATE
	349-18B	April 1991
		Figure 1

ROBERT PRATER ASSOCIATES
Consulting Soil, Foundation & Geological Engineers

Robert R. Prater, C.E. 1942-1980
Wm. David Hespeler, C.E.

May 6, 1991
349-18C, 91-226

Scripps Memorial Hospital
P.O. Box 28
La Jolla, California 92038

Attention: Mr. Bruce Heimbach, Office of Director of Facilities Development

Re: Soil Design Parameters
Medical Office Building and Hospital Expansion
Scripps Memorial Hospital Expansion - Phase I
Fifth Avenue and H Street
Chula Vista, California
SMH Job No. 88-0311-A

Gentlemen:

In accordance with the request of your structural engineer Mr. Brad Lowe of Nowak-Meulmeister and Associates, we are providing additional lateral pressure and seismic design parameters for the design of the proposed hospital expansion to be constructed at the Scripps Memorial Hospital site in Chula Vista, California. We previously performed a geotechnical investigation for the proposed hospital expansion the results of which were presented in our report dated April 1, 1991.

In our geotechnical investigation report we have presented values of the design lateral earth pressure for restrained walls. It is our understanding that a cantilever, unrestrained retaining wall is also proposed for construction at the site. We recommend that the unrestrained wall be designed for an equivalent fluid pressure of 40 pounds per cubic foot. The other design recommendations presented in our report for restrained walls are also applicable to the unrestrained wall.

It is our understanding that the Uniform Building Code (UBC) static lateral force procedure will be used to design the addition for earthquake loading conditions. The procedure requires the use of a soil "S" factor for input into the total design lateral force equation. As indicated in our geotechnical investigation report the hospital site is underlain by the Pleistocene age Bay Point Formation consisting of medium dense silty and clayey sand and stiff to very stiff sandy and silty clay. The depth of the Bay Point Formation is estimated to be about 100 feet. The Bay Point Formation is underlain by the Tertiary San Diego Formation and other Tertiary age formations to depths greater than 1,000 feet. Based on the site geology, it is our opinion that the soil profile description corresponding to Type S₂ as indicated in Table No. 23-J of the UBC (1988 edition) is applicable to the site. Accordingly, we recommend that a seismic coefficient of 1.2 be used for the design of the hospital addition.

Our services consist of professional opinions and recommendations made in accordance with generally accepted geotechnical engineering principles and practices. This warranty is in lieu of all other warranties either express or implied.

If you have any questions, please call.

Very truly yours,

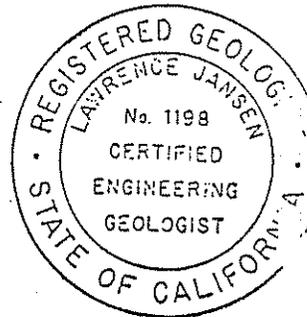
ROBERT PRATER ASSOCIATES

Zia Yazdani

Zia Yazdani, G.E.



Lawrence Jansen
Lawrence Jansen, C.E.G.

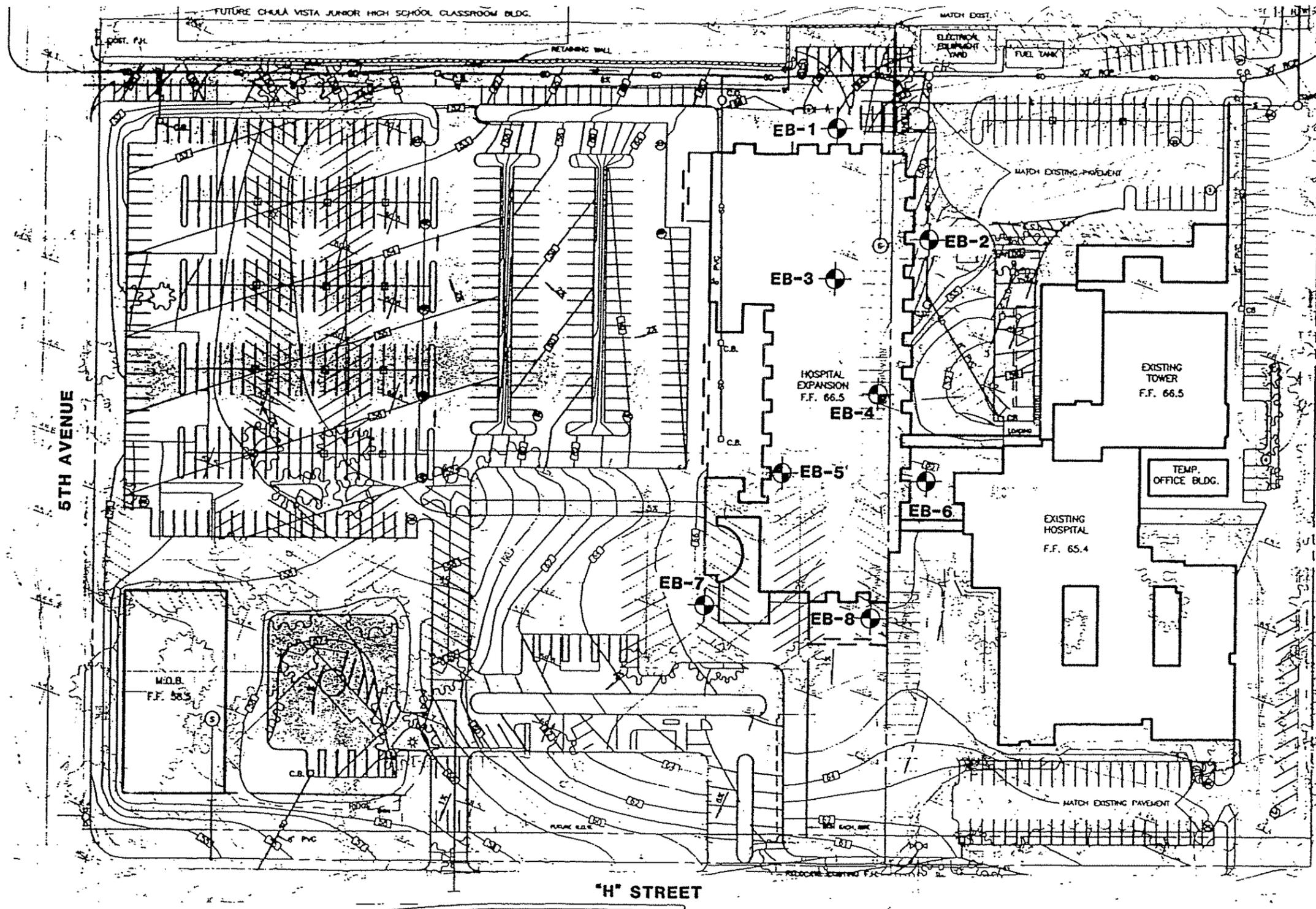


ZY/LJ:kj

Copies: Addressee (3)

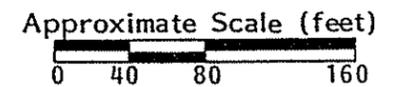
Nowak-Meulmeister and Associates, Attn: Mr. Brad Lowe (1)

James Leary Architecture and Planning, Attn: Mr. James Leary (1)



LEGEND

EB-1 Indicates approximate location of exploratory boring.



Base: Phase I grading and utility plan titled "Hospital Expansion, Scripps Memorial Hospital, Chula Vista, California", Sheet C-1, dated 3/21/90, prepared by Safino, Butcher and Ormonde, Inc.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers			SITE PLAN		
			SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
PROJECT NO.	DATE	Figure 2			
349-18B	April 1991				



EXPLANATION

Qaf
Artificial fill

Qal + Qsw
Alluvium and slope wash undifferentiated

Stream-terrace deposits

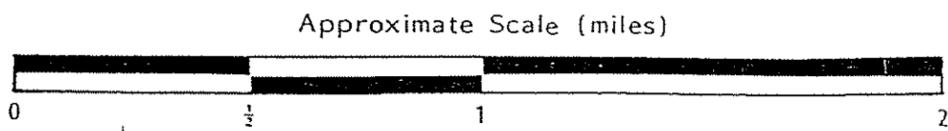
Qbp + Qn
Qbp + Qn
Bay Point Formation and unnamed, nearshore, marine sandstone
Qbp, Bay Point Formation;
Qn, unnamed, nearshore, marine sandstone;
-Qbp + Qn, Bay Point Formation and unnamed, nearshore marine sandstone undifferentiated.

Ql
Lindavista Formation

Tsdcg
Tsds
San Diego Formation
Tsdcg, conglomerate part; Tsds, sandstone part.

Contact
(Dashed where location is approximate, dotted where concealed)

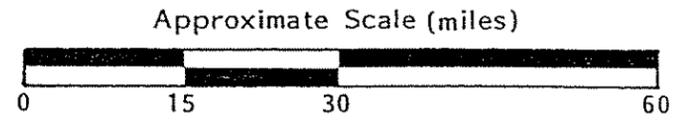
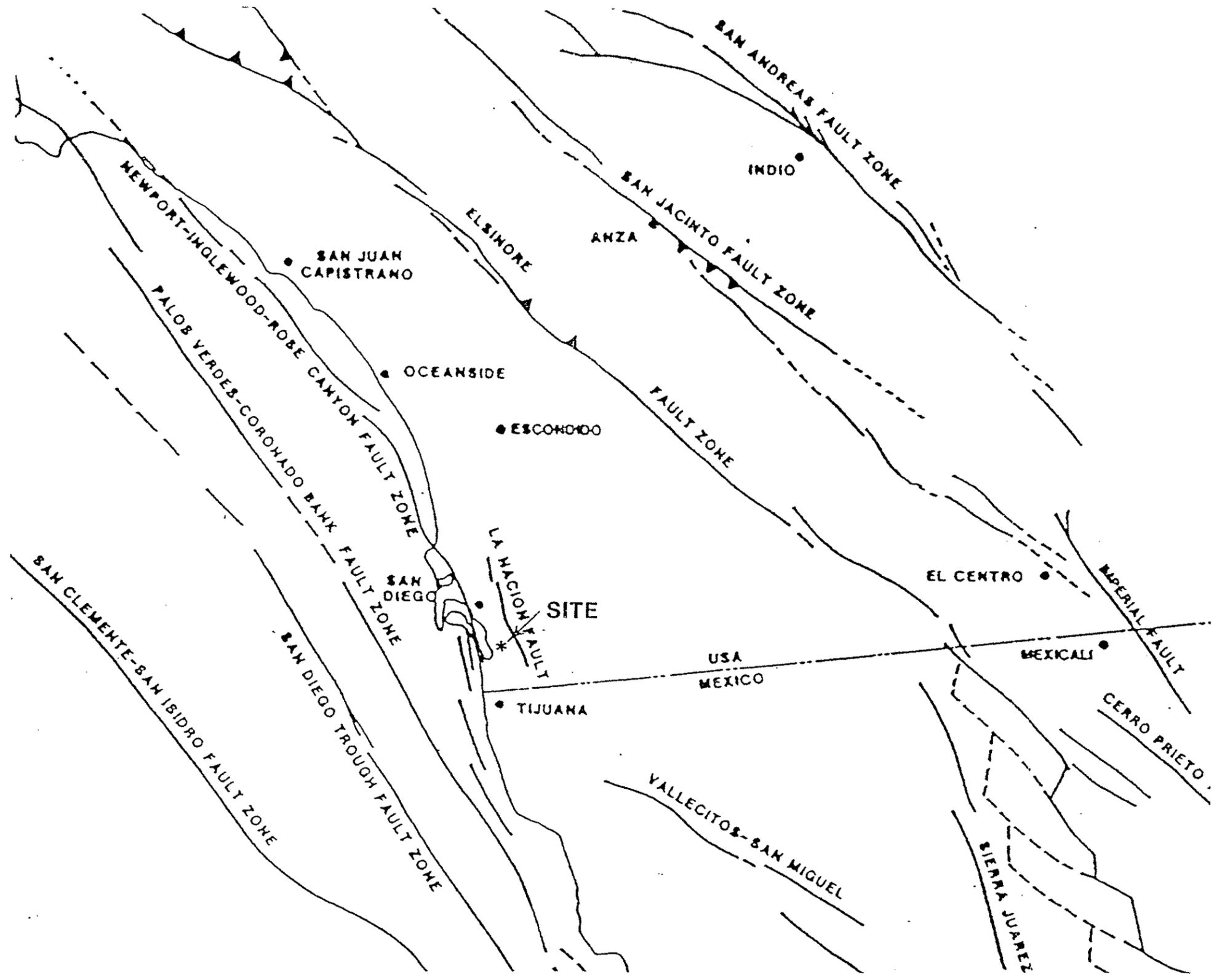
Fault
(Long dash where location is approximate, short dash where inferred, dotted where concealed, D, downthrown side; U, upthrown side; arrow and associated number indicate dip of fault)



Base: Portion of a geologic map titled "Geology of National City, Imperial Beach, and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," dated 1977, by Kennedy and Tan.

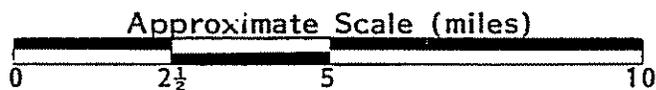
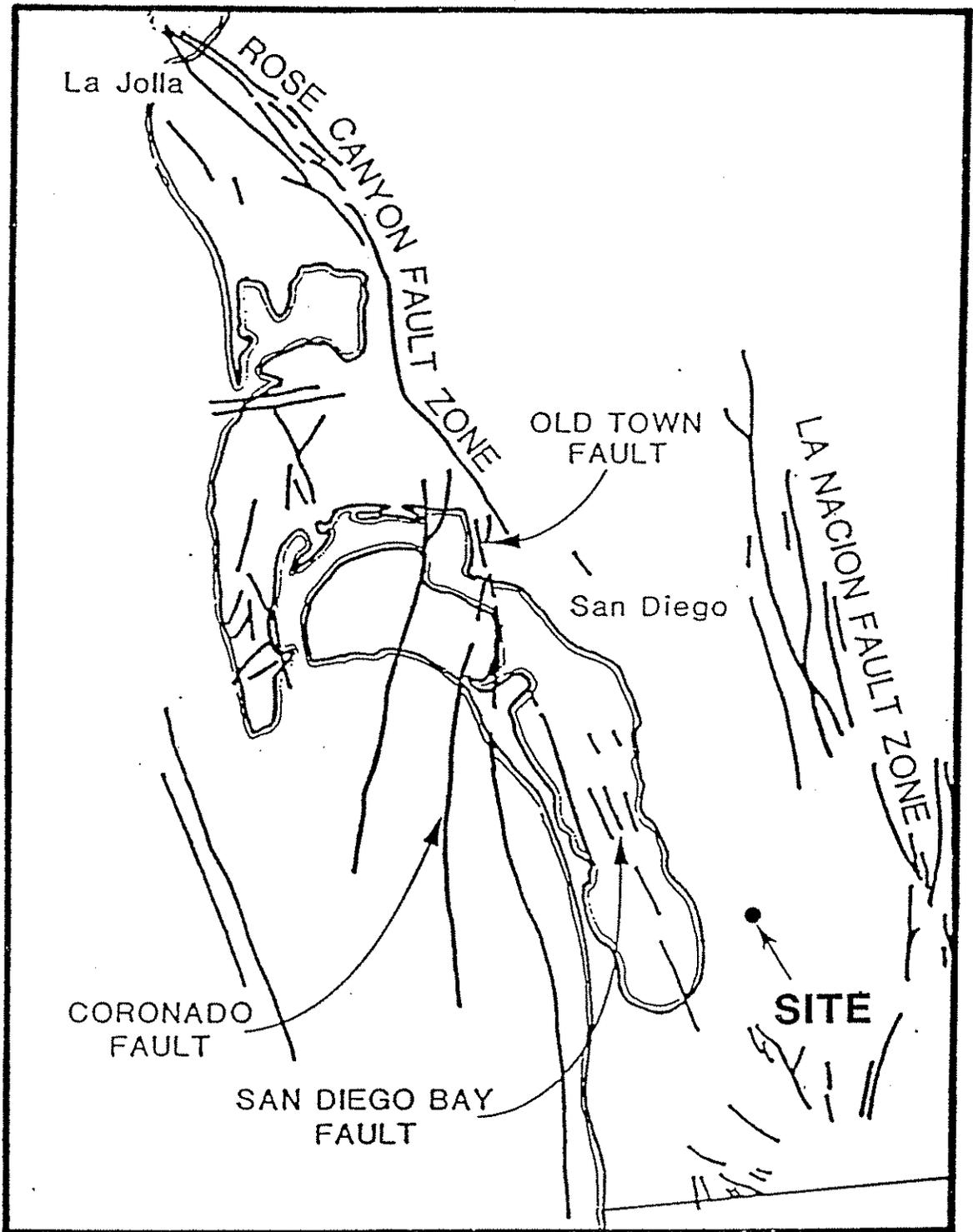
REGIONAL GEOLOGIC MAP		
SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
PROJECT NO	DATE	Figure 3
349-18B	April 1991	

ROBERT PRATER ASSOCIATES
Consulting Soil Foundation & Geological Engineers



Base: Figure 1 from "A Study of the Seismic Hazard in San Diego," by Anderson, Rockwell, and Agnew, dated November 17, 1987.

ROBERT PRATER ASSOCIATES Consulting Soil Foundation & Geological Engineers			REGIONAL FAULT LOCATION MAP	
			SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California	
PROJECT NO.	DATE	Figure 4		
349-18B	April 1991			



Base: Modified from Kennedy and Welday, 1980, CDMG Map Sheet 40.

ROBERT PRATER ASSOCIATES
 Consulting Soil Foundation & Geological Engineers

LOCAL FAULT MAP

SCRIPPS MEMORIAL HOSPITAL EXPANSION
 Chula Vista, California

PROJECT NO.

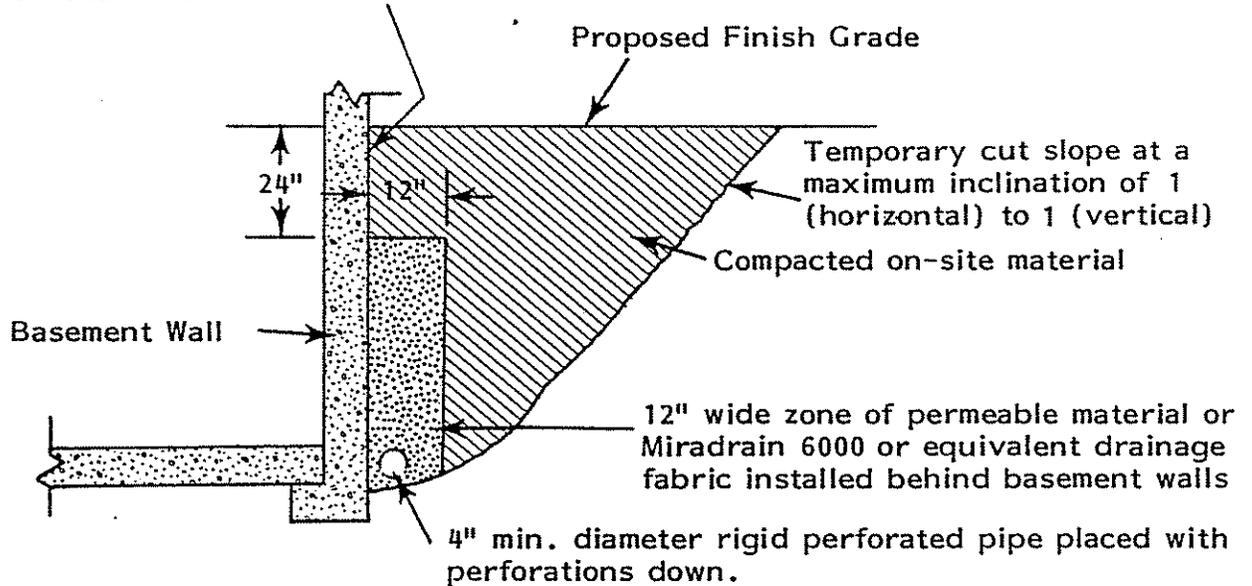
DATE

Figure 5

349-18B

April 1991

Waterproofing to be provided behind basement walls



SCHEMATIC ONLY

NOT TO SCALE

NOTES:

- 1) Positive surface gradient and/or drop inlets to be constructed behind the walls to prevent ponding and infiltration of surface water runoff.
- 2) Perforated pipe to discharge into a free outlet at a lower elevation.
- 3) Perforated pipe to have a minimum drainage gradient of 0.5 percent.
- 4) Permeable material shall consist of concrete sand conforming to the standards of ASTM C33. In lieu of permeable material, Miradrain 6000 or equivalent drainage fabric may be used. The drainage fabric should be placed continuously on the face of the wall. The perforated pipe should be surrounded by at least 4 inches of concrete sand wrapped in the drainage fabric.

ROBERT PRATER ASSOCIATES
 Consulting Soil, Foundation & Geological Engineers

SUBSURFACE DRAINAGE RECOMMENDATIONS

SCRIPPS MEMORIAL HOSPITAL EXPANSION
 Chula Vista, California

PROJECT NO.

DATE

349-18B

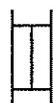
April 1991

Figure 6

APPENDIX A FIELD INVESTIGATION

The field investigation consisted of a surface reconnaissance and a subsurface exploration program using a truck-mounted, continuous-flight auger drill. Eight exploratory borings were drilled on March 13 through 15, 1991, at the approximate locations shown on the Site Plan, Figure 2. The soils encountered in the borings were continuously logged in the field by our representative and described in accordance with the Unified Soil Classification System (ASTM D 2487). Logs of the borings as well as a key for soil classification are included as part of this appendix. The boring locations shown on the site plan were estimated from a site plan titled "Scripps South Bay Hospital, Chula Vista", dated January 2, 1989 by Safino, Butcher and Ormonde, Inc.

Representative samples were obtained from the exploratory borings at selected depths appropriate to the investigation. All samples were returned to our laboratory for evaluation and testing. Standard penetration resistance blow counts were obtained by driving a 2-inch O.D. split spoon sampler with a 140-pound hammer dropping through a 30-inch free fall. The sampler was driven a maximum of 18 inches and the number of blows recorded for each 6-inch interval. The blows per foot recorded on the boring logs represent the accumulated number of blows that were required to drive the last 12 inches or portion thereof. Samples contained in liners were recovered by driving a 2.5-inch I.D. California sampler 18 inches into the soil using a 140-pound hammer. Boring log notations for the standard split spoon and California samplers as well as for jar and sack samples taken from auger cuttings are indicated below.



Standard Split Spoon Sampler



California Sampler

"x"

Indicates jar sample taken from auger cuttings.



Indicates sack sample taken from auger cuttings.

The boring logs show our interpretation of the subsurface conditions on the dates and at the locations indicated, and it is not warranted that they are representative of subsurface conditions at other locations and times.

PRIMARY DIVISIONS			GROUP SYMBOL	SECONDARY DIVISIONS
COARSE GRAINED SOILS MORE THAN HALF OF MATERIAL IS LARGER THAN NO. 200 SIEVE SIZE	GRAVELS MORE THAN HALF OF COARSE FRACTION IS LARGER THAN NO. 4 SIEVE	CLEAN GRAVELS (LESS THAN 5% FINES)	GW	Well graded gravels, gravel-sand mixtures, little or no fines.
		GRAVEL WITH FINES	GP	Poorly graded gravels or gravel-sand mixtures, little or no fines.
			GM	Silty gravels, gravel-sand-silt mixtures, non-plastic fines.
		GC	Clayey gravels, gravel-sand-clay mixtures, plastic fines.	
	SANDS MORE THAN HALF OF COARSE FRACTION IS SMALLER THAN NO. 4 SIEVE	CLEAN SANDS (LESS THAN 5% FINES)	SW	Well graded sands, gravelly sands, little or no fines.
		SANDS WITH FINES	SP	Poorly graded sands or gravelly sands, little or no fines.
			SM	Silty sands, sand-silt mixtures, non-plastic fines.
			SC	Clayey sands, sand-clay mixtures, plastic fines.
FINE GRAINED SOILS MORE THAN HALF OF MATERIAL IS SMALLER THAN NO. 200 SIEVE SIZE	SILTS AND CLAYS LIQUID LIMIT IS LESS THAN 50%		ML	Inorganic silts and very fine sands, rock flour, silty, or clayey fine sands or clayey silts with slight plasticity.
			CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays.
			OL	Organic silts and organic silty clays of low plasticity.
	SILTS AND CLAYS LIQUID LIMIT IS GREATER THAN 50%		MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts.
			CH	Inorganic clays of high plasticity, fat clays.
			OH	Organic clays of medium to high plasticity, organic silts.
HIGHLY ORGANIC SOILS			Pt	Peat and other highly organic soils.

DEFINITION OF TERMS

SILTS AND CLAYS	U.S. STANDARD SERIES SIEVE			CLEAR SQUARE SIEVE OPENINGS			COBBLES	BOULDERS
	200	40	10	4	3/4"	3"		
	SAND			GRAVEL				
	FINE	MEDIUM	COARSE	FINE	COARSE			

GRAIN SIZES

SANDS, GRAVELS AND NON-PLASTIC SILTS	BLOWS/FOOT [†]
VERY LOOSE	0 - 4
LOOSE	4 - 10
MEDIUM DENSE	10 - 30
DENSE	30 - 50
VERY DENSE	OVER 50

CLAYS AND PLASTIC SILTS	STRENGTH [‡]	BLOWS/FOOT [†]
VERY SOFT	0 - 1/4	0 - 2
SOFT	1/4 - 1/2	2 - 4
FIRM	1/2 - 1	4 - 8
STIFF	1 - 2	8 - 16
VERY STIFF	2 - 4	16 - 32
HARD	OVER 4	OVER 32

RELATIVE DENSITY

CONSISTENCY

[†] Number of blows of 140 pound hammer falling 30 inches to drive a 2 inch O.D. (1-3/8 inch I.D.) split spoon (ASTM D-1586).

[‡] Unconfined compressive strength in tons/sq. ft. as determined by laboratory testing or approximated by the standard penetration test (ASTM D-1586), pocket penetrometer, torvane, or visual observation.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	KEY TO EXPLORATORY BORING LOGS Unified Soil Classification System (ASTM D-2487)		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	Figure A-1
	349-18B	April 1991	

DRILL RIG	Continuous Flight Auger	SURFACE ELEVATION	60' (approx.)	LOGGED BY	CBW
DEPTH TO GROUNDWATER	None	BORING DIAMETER	6 Inches	DATE DRILLED	3/14/91

DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)	
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE							
ASPHALT CONCRETE PAVEMENT (3½" ac, no base)					0						
SANDY CLAY (topsoil)		dark brown	soft	CL	2		18				
CLAYEY SAND (formational terrace deposits) sandy clay at 5 feet		light brown	medium dense	SC	4		31				
		light grayish brown			6						
					8		34				
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	10						
					12		17				
					14						
CLAYEY SAND (formational terrace deposits)		dark yellowish brown	dense	SC	16						
					18		34				
					20						
					22						
SILTY-POORLY GRADED SAND (formational terrace deposits)		brown	medium dense	SM-SP	24						
					26						
					28		26				
Bottom of Boring = 30 Feet					30						

Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	EXPLORATORY BORING LOG		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	BORING NO.
	349-18B	April 1991	1

DRILL RIG	Continuous Flight Auger	SURFACE ELEVATION	55' (approx.)	LOGGED BY	CBW
DEPTH TO GROUNDWATER	None	BORING DIAMETER	6 Inches	DATE DRILLED	3/14/91

DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYMBOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (2½" ac on 4" base)					2		23			
CLAYEY SAND (formational terrace deposits)		yellowish brown	medium dense	SC	4					
SANDY CLAY (formational terrace deposits)		dark grayish brown	very stiff	CL	6		48			
					8					
		dark brown			10		23			
					12					
CLAYEY SAND (formational terrace deposits)		brown-reddish brown	dense	SC	14					
					16		32			
		light reddish brown	medium dense	SM	20					
					22					
SILTY SAND (formational terrace deposits)					24					
					26		26			
CLAYEY-SILTY SAND (formational terrace deposits)		light reddish brown	medium dense-dense	SC-SM	28					
					30		29			
Bottom of Boring = 30 Feet										

Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	EXPLORATORY BORING LOG		
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California		
	PROJECT NO.	DATE	BORING NO.
	349-18B	April 1991	2

DRILL RIG Continuous Flight Auger		SURFACE ELEVATION 60' (approx.)			LOGGED BY CBW					
DEPTH TO GROUNDWATER None		BORING DIAMETER 6 Inches			DATE DRILLED 3/14/91					
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (2" ac, no base)					2	X				
SANDY CLAY (topsoil)		reddish brown	soft	CL	4	X		18		
CLAYEY SAND (formational terrace deposits)		brown	medium dense	SC	6	X		21		
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	8					
					10	X	34			
					12					
					14		21			
					16					
CLAYEY and SILTY SAND (formational terrace deposits)		light reddish brown	dense	SC/SM	18					
					20		39			
					22					
					24					
SILTY SAND (formational terrace deposits)		olive brown	dense	SM	26					
					28		34			
					30					
Bottom of Boring = 30 Feet										
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION					
					Chula Vista, California					
					PROJECT NO.		DATE		BORING NO.	
349-18B		April 1991		3						

DRILL RIG Continuous Flight Auger		SURFACE ELEVATION 61' (approx.)			LOGGED BY CBW					
DEPTH TO GROUNDWATER None		BORING DIAMETER 6 Inches			DATE DRILLED 3/14/91					
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYMBOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (3" ac, no base)					2		14	14		
CLAYEY SAND (formational terrace deposits)		brown	medium dense	SC	4		8			
					6	x				
					8					
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	10	X	28			
					12					
					14					
					16					
CLAYEY-SILTY SAND (formational terrace deposits)		light brown	dense	SC-SM	18		30			
					20					
					22					
					24					
					26					
					28	x				
					30					
Bottom of Boring = 30 Feet										
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
<p>ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers</p>					PROJECT NO.		DATE		BORING NO.	
					349-18B		April 1991		4	

DRILL RIG Continuous Flight Auger		SURFACE ELEVATION 60' (approx.)		LOGGED BY CBW						
DEPTH TO GROUNDWATER None		BORING DIAMETER 6 inches		DATE DRILLED 3/14/91						
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (3" ac, no base)				CL	2		14	12		
SANDY CLAY (fill)		dark brown	soft	CL	4		29	5		
FILL ↑				SC	6					
CLAYEY SAND (formational sandstone/terrace deposits)		brown	medium dense	SC	6					
SILTY-POORLY GRADED SAND (formational terrace deposits)		light brown	medium dense	SM-SP	8		37			
					10					
SANDY CLAY (formational terrace deposits)		light grayish brown	very stiff	CL	12		18			
					14					
		brown			16					
					18					
CLAYEY SAND (formational terrace deposits)		brown	medium dense	SC	20		26			
					22					
					24					
					26					
SILTY SAND (formational terrace deposits)		olive brown	medium dense	SM	28		27			
					30					
Bottom of Boring = 30 Feet										
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
<p>ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers</p>					PROJECT NO.	DATE	BORING NO. 5			
					349-18B	April 1991				

DRILL RIG Continuous Flight Auger		SURFACE ELEVATION 59' (approx.)			LOGGED BY CBW					
DEPTH TO GROUNDWATER None		BORING DIAMETER 6 Inches			DATE DRILLED 3/15/91					
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (2" ac on 6" base)					2		10	16		
CLAYEY SAND (fill)		reddish brown	loose	SC	4					
FILL ↑ CLAYEY SAND (formational terrace deposits)		brown	medium dense	SC	6	x				
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	8	⊗	37			
		dark brown			10					
					12					
					14		23			
					16					
CLAYEY and SILTY SAND (formational terrace deposits)		light reddish brown	medium dense-dense	SC / SM	18					
					20		30			
					22					
					24					
					26					
					28					
					30		20			
Bottom of Boring = 30 Feet										
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
					PROJECT NO.		DATE		BORING NO.	
					349-18B		April 1991		6	

DRILL RIG Continuous Flight Auger		SURFACE ELEVATION 60' (approx.)			LOGGED BY CBW					
DEPTH TO GROUNDWATER None		BORING DIAMETER 8 Inches			DATE DRILLED 3/13/91					
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE						
ASPHALT CONCRETE PAVEMENT (2½" ac, no base)					2		12	12		
SANDY CLAY and CLAYEY SAND (residuum)		dark brown	stiff/medium dense	CL/SC	4	S				
CLAYEY SAND (formational terrace deposits)		light brown	medium dense	SC	6	X	23			
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	10	X	36			
					12	S				
					14					
					16		20			
					18					
CLAYEY SAND (formational terrace deposits)		reddish to light brown	medium dense	SC	20		25			
					22					
					24					
SILTY SAND (formational terrace deposits)		dark yellowish brown	medium dense	SM	26					
					28					
					30		19			
Bottom of Boring = 30 Feet										
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG					
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California					
<p>ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers</p>					PROJECT NO.	DATE	BORING NO. 7			
					349-18B	April 1991				

DRILL RIG		SURFACE ELEVATION		LOGGED BY							
Continuous Flight Auger		62' (approx.)		CBW							
DEPTH TO GROUNDWATER		BORING DIAMETER		DATE DRILLED							
None		6 Inches		3/14/91							
DESCRIPTION AND CLASSIFICATION					DEPTH (FEET)	SAMPLER	PENETRATION RESISTANCE (BLOWS/FT.)	WATER CONTENT (%)	SHEAR STRENGTH BY TORVANE (KSF)	UNCONFINED COMPRESSIVE STRENGTH (KSF)	
DESCRIPTION AND REMARKS	SYM-BOL	COLOR	CONSIST.	SOIL TYPE							
ASPHALT CONCRETE PAVEMENT (3" ac, no base)					2		18				
CLAYEY SAND (formational terrace deposits)		light brown	medium dense	SC	4						
					6						
					6	X	60	6			
					8	X					
SANDY CLAY (formational terrace deposits)		brown	very stiff	CL	10						
					12	X	53				
CLAYEY SAND (formational terrace deposits) sandy clay layer from 19 to 20 feet		light brown	medium dense	SC	14						
					16						
					18						
					20						
					20						
					20						
					22						
					24						
					26						
					28						
30											
Bottom of Boring = 30 Feet											
<p>Note: The stratification lines represent the approximate boundary between material types and the transition may be gradual.</p>					EXPLORATORY BORING LOG						
					SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California						
ROBERT PRATER ASSOCIATES <i>Consulting Soil, Foundation & Geological Engineers</i>					PROJECT NO.		DATE		BORING NO.		
					349-18B		April 1991		8		

APPENDIX B LABORATORY TESTING

The natural water content was determined on selected samples and is recorded on the boring logs at the appropriate sample depths.

Seven No. 200 sieve tests were performed on selected samples of the subsurface soils to aid in classifying the soils according to the Unified Soil Classification System. The results of these tests are presented in Table B-1.

One laboratory expansion test was performed on a representative sample of the more clayey soils encountered in the exploratory borings. The test was performed in accordance with Uniform Building Code Standard No. 29-2. The results of the test are presented in Table B-2.

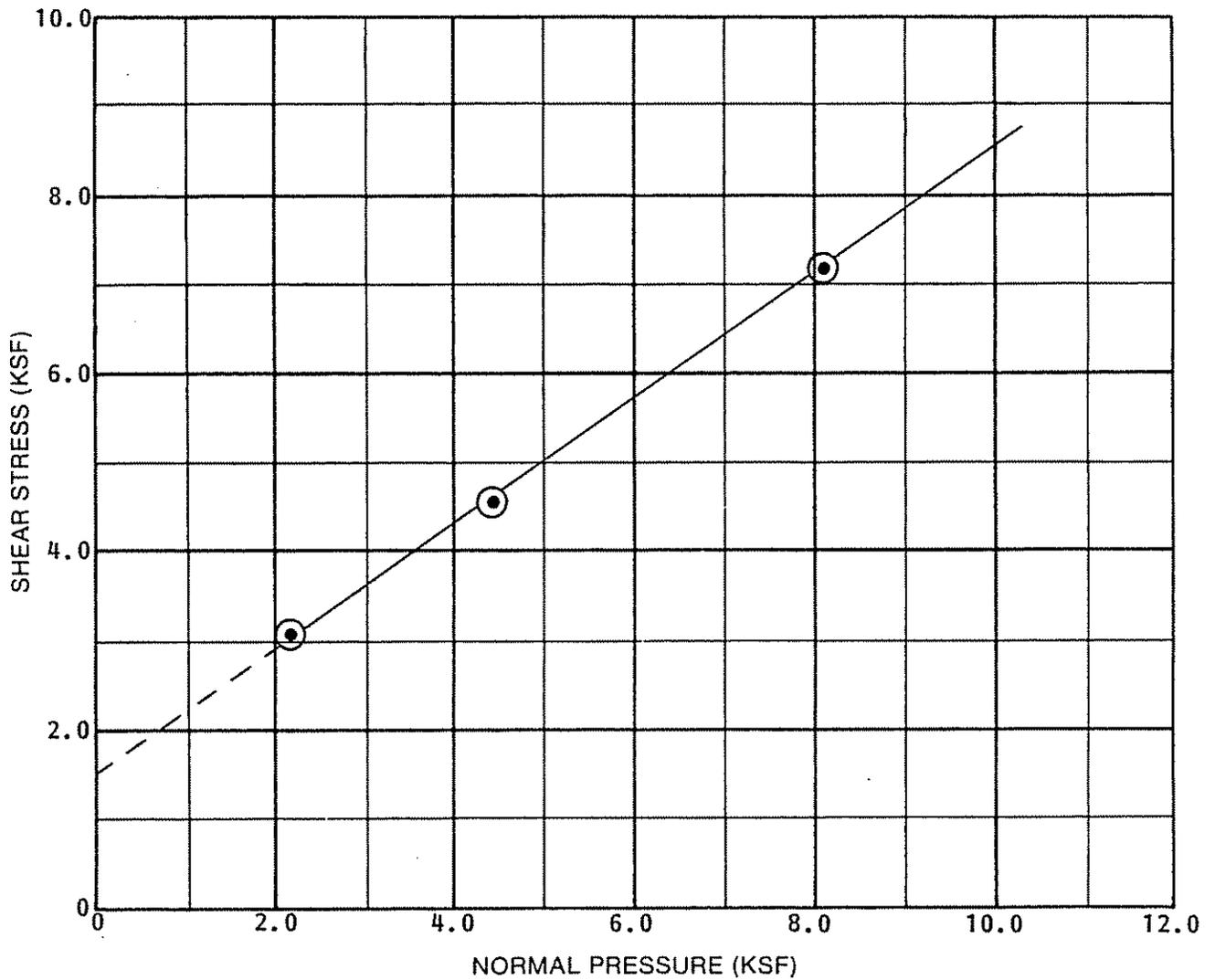
Two laboratory direct shear tests were performed on samples of the subsurface soils recovered with the California sampler. The samples were sheared at a constant rate under various surcharge pressures; failure was taken at the peak shear stress. The results of these tests are presented on Figures B-1 and B-2.

TABLE B-1
RESULTS OF NO. 200 SIEVE TESTS

<u>Exploratory Boring No.</u>	<u>Sample Depth (Feet)</u>	<u>Sample Description</u>	<u>Percent Passing No. 200 Sieve</u>
EB-1	2	CLAYEY SAND (SC), light brown	28
EB-1	5	SANDY CLAY (CL), brown	52
EB-1	13	SANDY CLAY (CL), brown	83
EB-2	3-6	SANDY CLAY (CL), dark grayish brown	72
EB-5	4½	SILTY-POORLY GRADED SAND (SM-SP), light brown	10
EB-7	2	CLAYEY SAND (SC), dark brown	37
EB-7	11	SANDY CLAY (CL), brown	68

TABLE B-2
RESULTS OF U.B.C. EXPANSION INDEX TEST

<u>Boring No.</u>	<u>Sample Depth (Feet)</u>	<u>Soil Type</u>	<u>Molding Moisture Content (%)</u>	<u>Initial Dry Density (pcf)</u>	<u>Expansion Index</u>
EB-2	3-6	SANDY CLAY (CL)	12.9	99.4	120

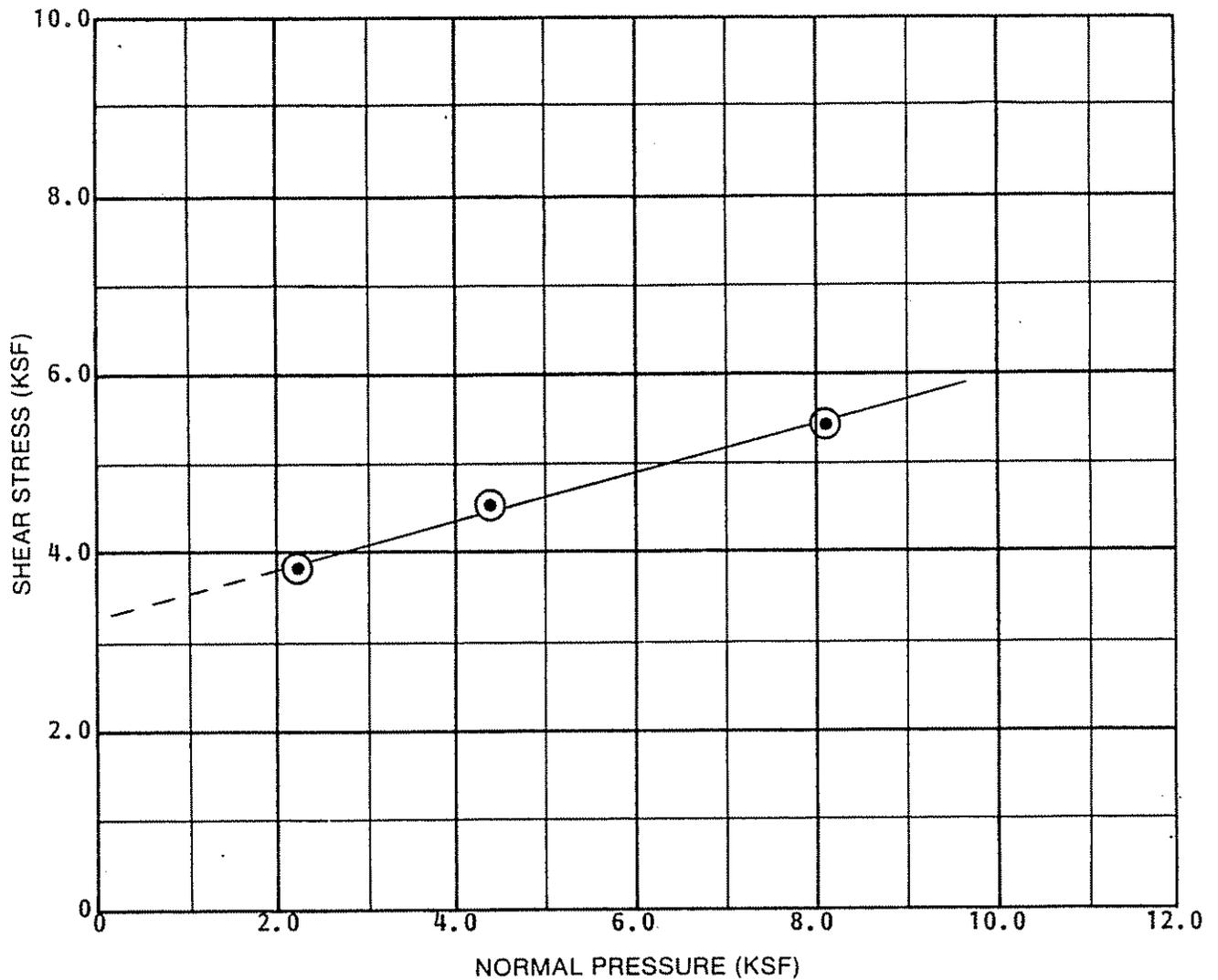


SAMPLE DATA	
DESCRIPTION: CLAYEY SAND (SC), light grayish brown	
BORING NO.: 1	
DEPTH (ft.): 9	ELEVATION (ft.): ---
TEST RESULTS	
APPARENT COHESION (C): 1.55 ksf	
APPARENT ANGLE OF INTERNAL FRICTION (ϕ): 34°	

TEST DATA				
TEST NUMBER	1	2	3	4
NORMAL PRESSURE (KSF)	2.20	4.40	8.07	
SHEAR STRENGTH (KSF)	3.10	4.57	7.23	
INITIAL H ₂ O CONTENT (%)	14.9	14.1	14.5	
FINAL H ₂ O CONTENT (%)	--	--	--	
INITIAL DRY DENSITY (PCF)	111.1	110.9	112.1	
FINAL DRY DENSITY (PCF)	--	--	--	
STRAIN RATE: 0.01 inch/minute (approx.)				

Note: Test was performed on a sample recovered with a California sampler.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	DIRECT SHEAR TEST DATA	
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California	
	PROJECT NO.	DATE
	349-18B	April 1991
		Figure B-1



SAMPLE DATA	
DESCRIPTION: SANDY CLAY (CL), brown	
BORING NO.:	7
DEPTH (ft.):	11
ELEVATION (ft.):	---
TEST RESULTS	
APPARENT COHESION (C):	3.30 ksf
APPARENT ANGLE OF INTERNAL FRICTION (ϕ):	15°

TEST DATA				
TEST NUMBER	1	2	3	4
NORMAL PRESSURE (KSF)	2.20	4.40	8.07	
SHEAR STRENGTH (KSF)	3.88	4.45	5.38	
INITIAL H ₂ O CONTENT (%)	19.4	20.0	19.1	
FINAL H ₂ O CONTENT (%)	--	--	--	
INITIAL DRY DENSITY (PCF)	109.3	107.7	109.2	
FINAL DRY DENSITY (PCF)	--	--	--	
STRAIN RATE:	0.01 inch/minute (approx.)			

Note: Test was performed on a sample recovered with a California sampler.

ROBERT PRATER ASSOCIATES Consulting Soil, Foundation & Geological Engineers	DIRECT SHEAR TEST DATA	
	SCRIPPS MEMORIAL HOSPITAL EXPANSION Chula Vista, California	
	PROJECT NO.	DATE
	349-18B	April 1991
		Figure B-2

**APPENDIX C
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APPENDIX G
ECONOMIC ANALYSIS

APPENDIX G

**SCRIPPS MEMORIAL HOSPITAL EXPANSION
AND ALTERNATIVES —
REVENUE PROJECTIONS**

SOCIOECONOMIC CONSIDERATIONS

During review of the project by various parties, concerns were expressed regarding the revenue generated to the City by the proposed project when compared with the fiscal benefits associated with continued commercial uses on the site. In addition, the Chula Vista Elementary School District has expressed concern regarding school fees to be paid by the project. Fiscal and school fee considerations are discussed in separate sections below.

FISCAL EFFECTS

In order to evaluate fiscal effects associated with the proposed project, an economic analysis was completed by Dr. Jun Onaka of P&D Technologies, Inc. The economic analysis addressed the effects of the project when compared with two alternatives proposed by existing tenants - the H Street Business Coalition Alternative and the Circinus Retail and Entertainment Alternative. The proposed project, as well as those two alternatives, are addressed together in this section to facilitate comparative review. The two alternatives are discussed further in Section 6.0, Alternatives.

Existing Conditions

-- General Acute Care Hospitals

According to State of California Office of Statewide Health Planning and Development (OSHPD), there were 31 general acute care (GAC) hospitals in San Diego County in 1989, with a total of 5,374 licensed beds for general acute care. Since the estimated countywide population on January 1, 1990, was 2,509,919, there were 2.14 GAC beds per 1,000 population.

In the South Bay area of San Diego County, consisting of the Cities of Chula Vista and Imperial Beach, a portion of the City of San Diego, and the Otay Mesa area of the

unincorporated San Diego County, there were two hospitals offering general acute care: Scripps Memorial Hospital (159 beds) and Community Hospital of Chula Vista (131 GAC beds), with a total of 290 beds. Community Hospital also has 98 beds licensed for long term care, which is outside the scope of the present study. The two hospitals served an area with population of 255,351, resulting in an average of 1.14 GAC beds per 1,000 population.

In comparison with the rest of San Diego County, the South Bay area had fewer beds per population for general acute care. This resulted in significantly higher occupancy rates in the two South Bay hospitals. In 1989, these rates were 83.2% and 77.7% for Scripps Memorial Hospital and Community Hospital, respectively, while the average rate for the county was 61.4%.

It is estimated that between 1990 and 2000, there is a demand for approximately 300 additional beds in general acute care serving the South Bay area. This estimate is based on the following information. Countywide, there were 1,204,602 patient-days in 1989, or approximately 480 patient-days per 1,000 population. Assuming an average occupancy rate of 65%, this results in a need for 2.02 beds per 1,000 population. Applying this factor to the 1990 population of 255,351 in the South Bay area results in 516 beds, or 226 more than is currently available at the two hospitals.

Between 1990 and 2000, San Diego Association of Governments (SANDAG) estimates that the population of the South Bay will increase 35,502 to 290,853. This additional population would result in a need for 72 GAC beds. In sum, there is a potential need for 298, or approximately 300, beds in the South Bay area.

Community Hospital of Chula Vista is currently constructing 79 additional beds. When completed, this will increase available beds in the South Bay to 369. Kaiser Permanente is presently proposing a hospital site in the eastern territories of Chula Vista consisting of 450 beds, with accompanying medical office space consisting of approximately 500,000 square feet. This would increase the available beds in the South Bay to 819.

Medical Offices

There are currently three medical office buildings in the vicinity of the proposed project: Chula Vista Medical Center, Bay Medical Plaza, and a two-story structure at the corner of H Street and 4th Avenue. Total gross area of these buildings is 121,000 square feet. In relation to the existing hospital, there is an average of 761 square feet per bed.

The two larger buildings are 100% leased, and the third has only two vacancies. Monthly rent ranges up to \$2.88 per rentable square foot. By way of comparison, new office buildings in downtown San Diego have rents from \$2.00 to \$2.75 per square foot. Full occupancy at high rents is evidence of substantial unmet demand for medical office space in this area.

The demand for medical office space is directly tied to an individual hospital. Highest premium is placed on the close proximity between the office and the hospital, in order to reduce the travel time for physicians, patients and service staff. The market is also affected by the management structure of the hospital and the number and types of specialties offered.

Scripps Memorial Hospitals have a particularly high demand for on-site or adjacent medical office space. The 476-bed hospital in La Jolla is currently constructing a medical office building which will add 215,000 square feet to the 150,000 square feet already on site. The proposed 200-bed San Marcos hospital will initially have a 90,000 square foot medical office building, increasing to 250,000 square feet.

Commercial Retail and Taxable Sales

During 1989, total taxable retail sales in Chula Vista was \$872,629,000. This represented 5.9% of the total taxable retail sales in the county (Table 9).

TABLE 9
TAXABLE RETAIL SALES IN CHULA VISTA, 1989
(In Thousands of Dollars)

	San Diego County	Chula Vista	Chula Vista's Share of Countywide Sales
Apparel Stores	\$ 787,646	\$ 46,302	5.9%
General Merchandise Stores	2,385,706	246,401	10.3%
Drug Stores	314,181	21,440	6.8%
Food Stores	1,205,124	78,154	6.5%
Packaged Liquor Stores	152,368	4,753	3.1%*
Eating and Drinking Places	1,920,620	104,999	5.5%
Homes Furnishing and Appliances	743,971	53,906	7.2%
Building Materials and Farm Implements	1,455,932	82,461	5.7%
Auto Dealers and Auto Supplies	2,721,863	69,487	2.6%*
Service Stations	1,165,791	80,515	6.9%
Other Retail Stores	2,030,655	84,211	4.1%*
TOTAL RETAIL STORES	\$ 14,883,857	\$ 872,629	5.9%

Source: California Board of Equalization; P&D Technologies
Note: * indicates categories of retail sales for which Chula Vista's shares of County totals are below average. See text for additional discussion.

This share compares favorably with the shares of county totals represented by Chula Vista in population (5.2%), number of households (5.3%), and total household income (5.3%). That is, there are more retail expenditures in the City than would be expected solely from its residents. Among categories of retail stores, there are excess expenditures in all except packaged liquor stores, auto dealers and auto supplies, and "other retail." The "other retail" category consists primarily of specialty retail such as gift shops, bookstores, and others.

Chula Vista Center is a regional shopping center located across H Street from the project site. The center was extensively renovated and expanded in 1988. Total taxable sales in 1989 was \$125,523,000, generated by gross leasable area (GLA) of 823,000 square feet. This represented average sales of \$153 per square foot, which was considerably less than Plaza Bonita (\$218 per square foot) or Fashion Valley (\$210 per square foot).

The above data indicate that the city may have largely satisfied the demand for common shopping center and strip commercial uses. In order to obtain substantial, additional gains in taxable sales, unique approaches will be required. One approach, which is already used by Chula Vista, is to encourage the development of high-volume, off-price retail stores, which attract customers from distant areas.

There are 109,950 square feet of existing commercial uses onsite. Among these uses, a major generator of taxable sales is Arby's. It is estimated that this restaurant generates sales in excess of \$1,000,000 per year, resulting in sales tax revenues to Chula Vista of \$10,000 per year. (Gale Mcleod, pers. comm.). Other retail outlets onsite are estimated by the City of Chula Vista to generate sales of approximately \$2,150,000 per year, resulting in a total of \$3,150,000 per year in sales.

Property Tax and Tax Increment Revenues

The project area consists of 9 assessor's parcels totalling 388,125 square feet or 8.91 acres. The area was included in the amended Chula Vista Town Center II Redevelopment Project boundary in 1988. For tax increment calculations, the base year is fiscal year (FY) 1987-88. The total assessed value in the base year was \$3,148,443 (Table 10). By agreement with the County of San Diego, the Redevelopment Agency would receive 100% of tax increment revenues for 25 years, from FY 1988-89 to FY 2012-13. Thereafter, the County would receive 13.25% and the agency, 86.75%. In January 1991, the fee title to land in the project area was sold for \$2,141,145.

-- Employment

Total employment located in Chula Vista in 1988 was 47,233 (Table 11). This represented 4.1% of the countywide total, which is less than the city's share (5.3%) of the total population in the county. There is thus a net export of workers from the city, principally to the City of San Diego. Chula Vista has relatively high shares of employment in manufacturing, due to the presence of Rohr Industries, and in retail trade. The latter fact is consistent with the relatively high proportion of taxable sales which are recorded in the City.

Onsite, there are 8 existing businesses, with an estimated total of 54 full-time equivalent employment (Table 12). (Two part-time positions are assumed equivalent to one full-time position.) Although not on the project site, the existing hospital employs 556 persons, or about 4.2 employees per occupied bed.

TABLE 10 PROJECT AREA ASSESSMENT ROLL, 1987-88			
Parcel No.	Land	Improvements	Total Assessment
568-370-30	\$ 4,966	\$ 20,112	\$ 25,078
568-370-31	21,297	332,761	354,058
568-370-32	2,479	41,415	43,894
568-370-33	4,966	56,563	61,529
568-370-34	125,551	37,627	163,178
568-370-40	12,539	129,221	141,760
568-370-42	20,112	212,174	232,286
568-370-47	848,371	1,129,720	1,978,091
568-370-48	10,612	137,957	148,569
T O T A L	\$ 1,050,893	\$ 2,097,550	\$ 3,148,443

Source: County of San Diego, Office of the Assessor.

**TABLE 11
EMPLOYMENT IN CHULA VISTA, 1988**

	San Diego County	Chula Vista	Chula Vista's Share of Countywide Sales
Agriculture, Forestry, Fishing, Mining	27,007	243	0.9%
Construction	71,029	1,637	2.3%
Manufacturing	133,183	11,425	8.6%
Transportation, Communication, Utilities	38,695	1,199	3.1%
Wholesale Trade	44,054	1,602	3.6%
Retail Trade	199,125	11,946	6.0%
Finance, Insurance, Real Estate	73,635	2,306	3.1%
Services	282,602	9,874	3.5%
Government, Military	293,826	7,001	2.4%
TOTAL	1,163,156	47,233	4.1%

Source: San Diego Association of Governments

**TABLE 12
EXISTING EMPLOYMENT ON PROJECT SITE**

	Full Time Equivalent Employment
Arby's	14
Captain Kidd's	2
Express Gasoline	10
Farrell's Ice Cream Parlor	3
Fiesta Cinema	6
First Interstate Bank	4
Readicare Center	9
Rollerskate Land	6
TOTAL	54

Source: P&D Technologies

Analysis

-- Supply Effects

Proposed Project

The proposed project will increase the number of general acute care (GAC) beds from 159 to 258 and construct a medical office building in two phases - 62,180 square feet, increasing to 124,420 square feet. During the second and ultimate phase, a parking structure for 775 cars will also be constructed. Upon completion of the proposed project as well as the expansion of the Community Hospital, there would be 468 beds for general acute care in the South Bay area. Assuming a 1995 population of 261,277 (SANDAG, Series 7 Forecasts) and 480 patient-days per 1,000 population, this would result in an occupancy rate of 73.4%.

There is currently a proposal by Kaiser Hospital to construct a 200-bed facility in Eastlake Village Center by 1998. If constructed as scheduled, the cumulative supply in the year 2000 would be 668 beds. Assuming a 2000 population of 290,853 and the same rate of hospital stay, the occupancy rate would be 57.3%.

The proposed project would increase the gross area of medical office space in the immediate vicinity of the hospital to 245,420 square feet, or 951 square feet per bed. This ratio is lower than what is under construction at Scripps Memorial Hospital in La Jolla. The entire space is likely to be occupied by physicians or other personnel associated with the hospital. As such, construction of the new medical office building is not expected to affect in any large extent the utilization of medical or commercial office buildings elsewhere in the City.

H Street Business Coalition Alternative

This alternative would have the same supply effects as the proposed project.

Retail and Entertainment Alternative

Under this alternative, there would be no effect to the supply of hospital beds or medical office space. Instead, this alternative would construct 124,990 square feet of commercial retail space, or an increase of 15,040 square feet over existing. This would represent a small part of the total supply of retail space in the City.

-- Tax Revenue Effects

The proposed project and the two alternatives would result in significant additional revenues to the Redevelopment Agency and the City of Chula Vista, in comparison to retaining existing uses with no redevelopment. This section examines potential effects on four revenue sources which would see the most significant change: tax increment revenues, sales tax revenues, utility users tax, and franchise tax. Effects on other taxes and on public service costs are anticipated to be of similar magnitudes for the proposed project and the two alternatives, hence are not included in the analysis.

Tax revenues are first estimated on an annual basis. For each alternative, revenues are projected for 30 years, from FY 1992-93 to FY 2021-22. The revenues are then discounted and summed to present values for comparison. Discounting is an accounting procedure in which future revenues are reduced in value, in the expectation that revenues available at present would generate interest income which would not be generated by future revenues. The discounted, or present, values provide a reliable method of comparing the economic worth of alternatives.

Table 13 is a summary of present values of the proposed project and alternatives, with variations as discussed below. The proposed project, when fully constructed, would generate revenues equal to about \$2.3 million in 1991 dollars. If only Phase 1 is built, and the ultimate phase is not built, this value would decline to about \$1.2 million.

**TABLE 13
SUMMARY OF DISCOUNTED REVENUES
FOR PROPOSED PROJECT AND ALTERNATIVES**

	Tax Increment	Sales Tax	Utility and Franchise Taxes	Total	Difference From Proposed Project
Proposed Project	\$ 1,629,600	\$ 200,800	\$ 511,800	\$ 2,342,200	—
Proposed Project Without Ultimate Phase	811,100	153,800	199,700	1,164,600	(\$ 1,177,600)
H Street Business Coalition	1,645,500	232,500	512,900	2,390,000	48,700
Retail and Entertainment (60% New Sales)	1,667,200	1,105,400	61,200	2,833,700	491,500
Retail and Entertainment (60% New Sales)	1,667,200	596,100	61,200	2,324,500	(17,700)

The alternative proposed by H Street Business Coalition is essentially the same, from the perspective of tax revenues, as the proposed project. The additional years of taxes collected from existing establishments along H Street would increase revenues to the City by less than \$50,000.

The Retail and Entertainment Alternative could result in substantial revenues to the City. However, this alternative as presently proposed, is unclear in a number of important areas. Depending on the degree to which the retail center would divert sales away from the Chula Vista Center and other retail areas of the City, this alternative may not result in any more revenues to the City than the proposed project. If, in addition, the developers of this alternative were to seek financial assistance from the Redevelopment Agency, then this alternative would be less desirable than the proposed project.

Proposed Project

The proposed project would generate tax increment revenues from the acquisition and sale of the 8.91-acre property and construction of taxable facilities. The hospital and about two-thirds of the site would be exempt from property taxation. However, the medical office building would be taxable, as well as a portion of the proposed parking structure.

The hospital and the medical center would contain pharmacies, medical supply store, and gift and book shops, which would generate taxable sales. The hospital is a major user of electricity and natural gas, which are subject to the City's utility users tax and franchise tax. Projected energy consumption in excess of existing is included in the analysis.

A variation of the proposed project was examined, in which the ultimate phase is not built. The potential reduction in revenues is \$1.2 million.

H Street Business Coalition Alternative

This alternative is similar to the proposed project with respect to revenue impacts. However, taxes paid by Arby's, First Interstate Bank, and Readicare Center would continue to be collected by the City until commencement of construction of the ultimate phase, which may be several years after the commencement of construction of Phase 1.

Retail and Entertainment Center Alternative

This alternative proposes to develop commercial uses on the project site. No hospital uses would occur. The alternative has been graphically depicted, with a summary of proposed uses. However, there are no market or financial feasibility analyses available for this plan. Such studies are necessary in order to resolve the following issues:

- o What is the probable share of sales at this center which would be new to the City?
- o What is the probable timing of land acquisition and development?
- o Would the project require any subsidy from the Redevelopment Agency?

Due to the fact that the City already generates more than its proportionate share of taxable sales in the County and that average sales at the recently renovated Chula Vista Center is \$153 per square foot, it is likely that a substantial portion of sales at this proposed center would be sales diverted from other areas in the City. In the absence of a market study, two scenarios were examined: One with share of new sales at 60% (i.e., 40% of sales are diverted from other stores in the City) and another with share of new sales at 30% (i.e., 70% of sales are diverted).

Based on the above, the total discounted value of tax increment, sales tax, utility users tax, and franchise tax would be \$2.8 million, or about \$490,000 more than the total discounted value of taxes for the proposed project. If the share of sales is 30% the discounted value of these taxes would be \$2.3 million, which is the same as the proposed project.

If this alternative requires a subsidy from the agency, then, first, the share of sales, which would be new to the City and not diverted from other retail areas, must be large enough to generate a surplus of present value over the proposed project, and, second, the subsidy should not exceed such a surplus.

The above discussion does not consider the fact that the proposed project would create a much larger employment base than the retail alternative (see Employment Effects, below). When employment effects are considered along with revenues, the alternative to the proposed project must have a significantly higher present value before it can be regarded as comparable in economic worth.

-- Employment Effects

Proposed Project

Scripps Memorial Hospital plans to assign 4.0 employees per occupied bed in the expanded hospital. Based on an average occupancy rate of 73.4% (see Supply Effects above), it is anticipated that the expanded hospital would employ 757 persons. This represents an increase of 201 employees over the existing hospital.

Employment in the medical office building is estimated to be 140 persons after Phase 1 and 280 after the ultimate phase. The estimates are based on an average space per employee of 444 square feet, the same as existing medical office building at Scripps Memorial Hospital in La Jolla.

The hospital expansion and the medical office building would ultimately create 481 new jobs, or an increase of 427 jobs over those currently on the project site. It should be noted, however, that existing employment would not be lost to the city, as they are expected to be relocated elsewhere in Chula Vista. A gain of 481 jobs would represent 1% of total employment in the City.

The projected growth in employment is a significant, positive effect of the proposed project, which would increase job opportunities in the urban core, increase retail expenditures and indirectly strengthen the economic base of the City.

H Street Business Coalition Alternative

Under this alternative, the ultimate effect on employment would remain the same as the proposed project. However, an estimated total of 27 workers would remain onsite for several years until the start of ultimate phase construction.

Retail and Entertainment Alternative

Proposed uses in this alternative include four facilities which already exist onsite: Arby's, First Interstate Bank, Readicare Center and a roller skating rink. These uses employ 33 persons. Other uses are restaurant, retail, theater and child care, for which 53 employees may be required. Altogether, this proposal is anticipated to support 86 jobs, of which 53 would be new jobs.

Recommendations

No negative economic effects are anticipated to occur as a result of the proposed project. However, the following measures are recommended in order to increase fiscal and economic benefits to the agency and the City:

- o Guidelines established by the City and the state should be strictly observed in the relocation of existing businesses. Appropriate assistance should be given to find new locations which are close to the existing locations and to retain existing clientele as much as possible.
- o The Redevelopment Agency should seek assurances from the hospital that either property taxes or in-lieu payments will be made, the sum of which would be equal to 1% of the construction cost of the ultimate phase of the medical office building and parking structure, even if the facilities are not constructed or are only partially constructed.
- o The City should review future proposals for construction or expansion of hospitals and other medical facilities, in order to balance supply with anticipated demand for such facilities.

SCHOOLS

Existing Conditions

The proposed Scripps Hospital Expansion is located within the Chula Vista Elementary School District and the Sweetwater Union High School District areas in the City of Chula Vista. Although no direct student generation would occur with implementation of the proposed non-residential project, students may be indirectly generated as more employees are hired with expansion of the hospital facility and more into the area to live and work.

The State Legislature, through the enactment of Government Code Sections 53080, 65995 and 65996, has determined the fair share burden of school facilities mitigation costs that may be placed on any commercial development project. Under Government code Section 65995(b), the maximum development fee is \$0.25 per square foot of development. This maximum fee is established for quasi-adjudicatory actions such as a conditional use permit (CUP). The maximum fee may not apply to quasi-legislative actions such as a plan amendment.

Potential Impacts

As stated above, State Government Code Sections 53080, 65995 and 65996 determine the fair share burden of school facilities mitigation costs that may be placed on any commercial development project. Under Government Code Section 65995(b), the maximum development fee is \$0.25 per square foot of development. With implementation of Phase I of the Scripps Hospital Expansion, approximately \$45,000 in school fees would be collected.

The above State Government Code Sections applies to the Scripps Hospital Expansion development due to the fact that the project is considered a "development project" such as a CUP, as defined by the discretionary actions required for approval (Section 2.0 Project Description). A "development project" is defined as "any project undertaken for the purpose of development, and includes the issuance of a permit for construction or reconstruction, but not a permit to operate." (Government Code Section 53080(2)).

The project does not require any quasi-legislative actions such as a rezone or redevelopment plan amendment. The City of Chula Vista has determined that the proposed project is in conformance with the Town Centre II Redevelopment Plan, therefore a plan amendment would not be required. Furthermore, zoning for the proposed expansion site is C-C-D (Central Commercial). A hospital facility is allowed within this zone with approval of a CUP.

Since the project does not require a rezone or plan amendment, the project would not be considered a legislative action. Because the project is not legislative in nature, but is considered a development project, Govt Code Sections 53080, 65995 and 65996 would be applicable for contribution to school facilities with project implementation. As described above, the maximum fee established by these codes is \$0.25/square foot.

Recommendations

As directed by Govt Code Sections 53080, 65995 and 65996, the Scripps Hospital Expansion project would provide a fair share contribution of \$0.25 per square foot of development to mitigate impacts to the Chula Vista Elementary School District and Sweetwater Union High School District with project implementation.

Conclusion

As employees move into the area to work at the expanded Scripps Hospital, the proposed project may indirectly generate additional students attending the Chula Vista Elementary School District and Sweetwater Union High School District classrooms. With implementation of the mitigation measure described above, impacts to the school district would be mitigated to below a level of significance.

APPENDIX A

Tax Increment and Sales Tax

Proposed Project

The following assumptions are made with respect to the proposed project:

- o The project site and improvements will be acquired by the Redevelopment Agency and conveyed to Scripps Memorial Hospital during fiscal year (FY) 1991-92. The estimated cost of acquisition for the taxable portion of the site is \$3,015,328.
- o The hospital would pay property tax on possessory interest and/or make in lieu payments on 34.2% of the land, 100% of the medical office building, and 60% of the parking garage.
- o Phase 1 would be completed in FY 1995-96. The estimated cost of construction is \$9,078,200 (= 62,180 sq ft x \$120/sq.ft. x escalation at 4% for 5 years).
- o Phase 2 (Ultimate) would be completed in FY 1999-2000. The estimated cost of construction is \$15,445,900, consisting of medical office addition at \$10,630,400 (= 62,240 sq.ft. x \$120/sq.ft. x escalation at 4% for 9 years) and 60% of parking garage at \$4,815,500 (= 60% x \$5,639,375 x escalation at 4% for 9 years).
- o Retail uses generating taxable sales occupy 6,800 sq.ft. in the medical office building, to be built in two equal phases, and 320 sq.ft. in the hospital, to be built in Phase 1. These uses are expected to generate sales of \$678,892 in FY 1996-97 and additional \$725,889 in FY 2000-01, after 4% escalation. Average sales is assumed to be \$150 per square foot before escalation.

Estimated tax revenues from FY 1991-92 to FY 2021-22 are shown in Tables 1 and 2. Using a discount rate of 8.5%, the approximate cost of funds for the agency, the present value of tax increment revenues is \$1,629,600 and that of sales tax revenues, \$200,800.

TABLE 1. TAX INCREMENT PROJECTIONS: PROPOSED PROJECT

Year	Fiscal Year	Assessed Valuation Previous FY	Forecast Increase at 2%	Added by Sale or New Construction	Adj. for Prior Value or Demolition	Assessed Valuation Current FY	Incremental Assessed Value	Estimated Tax Increment	County Share	Annual Revenue to Chula Vista
(4)	1987-88					3,148,443				
(3)	1988-89	3,148,443	62,969	0	0	3,211,412	62,969	630	0	630
(2)	1989-90	3,211,412	64,228	0	0	3,275,640	127,197	1,272	0	1,272
(1)	1990-91	3,275,640	65,513	0	0	3,341,153	192,710	1,927	0	1,927
0	1991-92	3,341,153	66,823	2,141,145	(1,137,520)	4,411,601	1,263,158	12,632	0	12,632
1	1992-93	4,411,601	88,232	3,015,328	(2,183,968)	5,331,193	2,182,750	21,827	0	21,827
2	1993-94	5,331,193	106,624	0	(1,181,091)	4,256,726	1,108,283	11,083	0	11,083
3	1994-95	4,256,726	85,135	0	(1,204,713)	3,137,147	(11,296)	0	0	0
4	1995-96	3,137,147	62,743	0	0	3,199,890	51,447	514	0	514
5	1996-97	3,199,890	63,998	9,078,200	0	12,342,088	9,193,645	91,936	0	91,936
6	1997-98	12,342,088	246,842	0	0	12,588,930	9,440,487	94,405	0	94,405
7	1998-99	12,588,930	251,779	0	0	12,840,708	9,692,265	96,923	0	96,923
8	1999-2000	12,840,708	256,814	0	0	13,097,523	9,949,080	99,491	0	99,491
9	2000-01	13,097,523	261,950	15,445,900	0	28,805,373	25,656,930	256,569	0	256,569
10	2001-02	28,805,373	576,107	0	0	29,381,480	26,233,037	262,330	0	262,330
11	2002-03	29,381,480	587,630	0	0	29,969,110	26,820,667	268,207	0	268,207
12	2003-04	29,969,110	599,382	0	0	30,568,492	27,420,049	274,200	0	274,200
13	2004-05	30,568,492	611,370	0	0	31,179,862	28,031,419	280,314	0	280,314
14	2005-06	31,179,862	623,597	0	0	31,803,459	28,655,016	286,550	0	286,550
15	2006-07	31,803,459	636,069	0	0	32,439,529	29,291,086	292,911	0	292,911
16	2007-08	32,439,529	648,791	0	0	33,088,319	29,939,876	299,399	0	299,399
17	2008-09	33,088,319	661,766	0	0	33,750,085	30,601,642	306,016	0	306,016
18	2009-10	33,750,085	675,002	0	0	34,425,087	31,276,644	312,766	0	312,766
19	2010-11	34,425,087	688,502	0	0	35,113,589	31,965,146	319,651	0	319,651
20	2011-12	35,113,589	702,272	0	0	35,815,861	32,667,418	326,674	0	326,674
21	2012-13	35,815,861	716,317	0	0	36,532,178	33,383,735	333,837	0	333,837
22	2013-14	36,532,178	730,644	0	0	37,262,821	34,114,378	341,144	45,202	295,942
23	2014-15	37,262,821	745,256	0	0	38,008,078	34,859,635	348,596	46,189	302,407
24	2015-16	38,008,078	760,162	0	0	38,768,239	35,619,796	356,198	47,196	309,002
25	2016-17	38,768,239	775,365	0	0	39,543,604	36,395,161	363,952	48,224	315,728
26	2017-18	39,543,604	790,872	0	0	40,334,476	37,186,033	371,860	49,271	322,589
27	2018-19	40,334,476	806,690	0	0	41,141,166	37,992,723	379,927	50,340	329,587
28	2019-20	41,141,166	822,823	0	0	41,963,989	38,815,546	388,155	51,431	336,725
29	2020-21	41,963,989	839,280	0	0	42,803,269	39,654,826	396,548	52,543	344,006
30	2021-22	42,803,269	856,065	0	0	43,659,334	40,510,891	405,109	53,677	351,432

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$1,629,610

TABLE 2. SALES TAX PROJECTIONS: PROPOSED PROJECT

Year	Fiscal Year	Taxable Sales Previous FY	Forecast Increase at 4%	Sales Added by New Outlets	Reduced for Discontinued Outlets	Taxable Sales Current FY	Sales Tax Revenues to City at 1%
(1)	1990-91					3,150,000	
0	1991-92	3,150,000	126,000	0	0	3,276,000	32,760
1	1992-93	3,276,000	131,040	0	0	3,407,040	34,070
2	1993-94	3,407,040	136,282	0	0	3,543,322	35,433
3	1994-95	3,543,322	141,733	0	(3,685,054)	0	0
4	1995-96	0	0	0	0	0	0
5	1996-97	0	0	678,892	0	678,892	6,789
6	1997-98	678,892	27,156	0	0	706,048	7,060
7	1998-99	706,048	28,242	0	0	734,290	7,343
8	1999-2000	734,290	29,372	0	0	763,662	7,637
9	2000-01	763,662	30,546	725,889	0	1,520,097	15,201
10	2001-02	1,520,097	60,804	0	0	1,580,901	15,809
11	2002-03	1,580,901	63,236	0	0	1,644,137	16,441
12	2003-04	1,644,137	65,765	0	0	1,709,902	17,099
13	2004-05	1,709,902	68,396	0	0	1,778,299	17,783
14	2005-06	1,778,299	71,132	0	0	1,849,430	18,494
15	2006-07	1,849,430	73,977	0	0	1,923,408	19,234
16	2007-08	1,923,408	76,936	0	0	2,000,344	20,003
17	2008-09	2,000,344	80,014	0	0	2,080,358	20,804
18	2009-10	2,080,358	83,214	0	0	2,163,572	21,636
19	2010-11	2,163,572	86,543	0	0	2,250,115	22,501
20	2011-12	2,250,115	90,005	0	0	2,340,120	23,401
21	2012-13	2,340,120	93,605	0	0	2,433,724	24,337
22	2013-14	2,433,724	97,349	0	0	2,531,073	25,311
23	2014-15	2,531,073	101,243	0	0	2,632,316	26,323
24	2015-16	2,632,316	105,293	0	0	2,737,609	27,376
25	2016-17	2,737,609	109,504	0	0	2,847,113	28,471
26	2017-18	2,847,113	113,885	0	0	2,960,998	29,610
27	2018-19	2,960,998	118,440	0	0	3,079,438	30,794
28	2019-20	3,079,438	123,178	0	0	3,202,615	32,026
29	2020-21	3,202,615	128,105	0	0	3,330,720	33,307
30	2021-22	3,330,720	133,229	0	0	3,463,949	34,639

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$200,780

However, if the ultimate phase of the project is not built, then the present values of tax increment and sales tax revenues would be \$811,100 and \$153,800. (Tables 3 and 4).

H Street Business Coalition Alternative

This is the same as the proposed project, with the following modifications:

- o All uses except Arby's, First Interstate Bank and Readicare Center would be relocated during FY 1993-94.
- o Arby's, First Interstate Bank and Readicare Center would be relocated during FY 1997-98.

Estimated tax revenues under this alternative are shown in Tables 5 and 6. Discounted values of tax increment and sales tax revenues are \$1,645,500 and \$232,500.

Retail and Entertainment Alternative

This alternative proposes to develop a specialty and entertainment center on the project site. No hospital-related uses would occur on site.

There are no market or financial analyses available for this alternative. For purposes of the present study, the following assumptions have been made:

- o The site would be privately acquired in FY 1992-93. The estimated acquisition price per square foot is the same as that assumed for the proposed project. The price for the entire site would be \$8,817,463.
- o Design, processing of permits and construction would occur during FY 1993-94 and FY 1994-95.

TABLE 3. TAX INCREMENT PROJECTIONS: PROPOSED PROJECT WITHOUT ULTIMATE PHASE

Year	Fiscal Year	Assessed Valuation Previous FY	Forecast Increase at 2%	Added by Sale or New Construction	Adj. for Prior Value or Demolition	Assessed Valuation Current FY	Incremental Assessed Value	Estimated Tax Increment	County Share	Annual Revenue to Chula Vista
(4)	1987-88					3,148,443			0	630
(3)	1988-89	3,148,443	62,969	0	0	3,211,412	62,969	630	0	1,272
(2)	1989-90	3,211,412	64,228	0	0	3,275,640	127,197	1,272	0	1,927
(1)	1990-91	3,275,640	65,513	0	0	3,341,153	192,710	1,927	0	12,632
0	1991-92	3,341,153	66,823	2,141,145	(1,137,520)	4,411,601	1,263,158	12,632	0	21,827
1	1992-93	4,411,601	88,232	3,015,328	(2,183,968)	5,331,193	2,182,750	21,827	0	11,083
2	1993-94	5,331,193	106,624	0	(1,181,091)	4,256,726	1,108,283	11,083	0	0
3	1994-95	4,256,726	85,135	0	(1,204,713)	3,137,147	(11,296)	0	0	514
4	1995-96	3,137,147	62,743	0	0	3,199,890	51,447	514	0	91,936
5	1996-97	3,199,890	63,998	9,078,200	0	12,342,088	9,193,645	91,936	0	94,405
6	1997-98	12,342,088	246,842	0	0	12,588,930	9,440,487	94,405	0	96,923
7	1998-99	12,588,930	251,779	0	0	12,840,708	9,692,265	96,923	0	99,491
8	1999-2000	12,840,708	256,814	0	0	13,097,523	9,949,080	99,491	0	102,110
9	2000-01	13,097,523	261,950	0	0	13,359,473	10,211,030	102,110	0	104,782
10	2001-02	13,359,473	267,189	0	0	13,626,662	10,478,219	104,782	0	107,508
11	2002-03	13,626,662	272,533	0	0	13,899,196	10,750,753	107,508	0	110,287
12	2003-04	13,899,196	277,984	0	0	14,177,180	11,028,737	110,287	0	113,123
13	2004-05	14,177,180	283,544	0	0	14,460,723	11,312,280	113,123	0	116,015
14	2005-06	14,460,723	289,214	0	0	14,749,938	11,601,495	116,015	0	118,965
15	2006-07	14,749,938	294,999	0	0	15,044,936	11,896,493	118,965	0	121,974
16	2007-08	15,044,936	300,899	0	0	15,345,835	12,197,392	121,974	0	125,043
17	2008-09	15,345,835	306,917	0	0	15,652,752	12,504,309	125,043	0	128,174
18	2009-10	15,652,752	313,055	0	0	15,965,807	12,817,364	128,174	0	131,367
19	2010-11	15,965,807	319,316	0	0	16,285,123	13,136,680	131,367	0	134,624
20	2011-12	16,285,123	325,702	0	0	16,610,825	13,462,382	134,624	0	137,946
21	2012-13	16,610,825	332,217	0	0	16,943,042	13,794,599	137,946	0	141,335
22	2013-14	16,943,042	338,861	0	0	17,281,903	14,133,460	141,335	18,727	122,608
23	2014-15	17,281,903	345,638	0	0	17,627,541	14,479,098	144,791	19,185	125,606
24	2015-16	17,627,541	352,551	0	0	17,980,092	14,831,649	148,316	19,652	128,665
25	2016-17	17,980,092	359,602	0	0	18,339,694	15,191,251	151,913	20,128	131,784
26	2017-18	18,339,694	366,794	0	0	18,706,487	15,558,044	155,580	20,614	134,966
27	2018-19	18,706,487	374,130	0	0	19,080,617	15,932,174	159,322	21,110	138,212
28	2019-20	19,080,617	381,612	0	0	19,462,229	16,313,786	163,138	21,616	141,522
29	2020-21	19,462,229	389,245	0	0	19,851,474	16,703,031	167,030	22,132	144,899
30	2021-22	19,851,474	397,029	0	0	20,248,504	17,100,061	171,001	22,658	148,343

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$811,083

TABLE 4. SALES TAX PROJECTIONS: PROPOSED PROJECT WITHOUT ULTIMATE PHASE

Year	Fiscal Year	Taxable Sales Previous FY	Forecast Increase at 4%	Sales Added by New Outlets	Reduced for Discontinued Outlets	Taxable Sales Current FY	Sales Tax Revenues to City at 1%
(1)	1990-91					3,150,000	
0	1991-92	3,150,000	126,000	0	0	3,276,000	32,760
1	1992-93	3,276,000	131,040	0	0	3,407,040	34,070
2	1993-94	3,407,040	136,282	0	0	3,543,322	35,433
3	1994-95	3,543,322	141,733	0	(3,685,054)	0	0
4	1995-96	0	0	0	0	0	0
5	1996-97	0	0	678,892	0	678,892	6,789
6	1997-98	678,892	27,156	0	0	706,048	7,060
7	1998-99	706,048	28,242	0	0	734,290	7,343
8	1999-2000	734,290	29,372	0	0	763,662	7,637
9	2000-01	763,662	30,546	0	0	794,208	7,942
10	2001-02	794,208	31,768	0	0	825,976	8,260
11	2002-03	825,976	33,039	0	0	859,015	8,590
12	2003-04	859,015	34,361	0	0	893,376	8,934
13	2004-05	893,376	35,735	0	0	929,111	9,291
14	2005-06	929,111	37,164	0	0	966,275	9,663
15	2006-07	966,275	38,651	0	0	1,004,926	10,049
16	2007-08	1,004,926	40,197	0	0	1,045,124	10,451
17	2008-09	1,045,124	41,805	0	0	1,086,928	10,869
18	2009-10	1,086,928	43,477	0	0	1,130,406	11,304
19	2010-11	1,130,406	45,216	0	0	1,175,622	11,756
20	2011-12	1,175,622	47,025	0	0	1,222,647	12,226
21	2012-13	1,222,647	48,906	0	0	1,271,553	12,716
22	2013-14	1,271,553	50,862	0	0	1,322,415	13,224
23	2014-15	1,322,415	52,897	0	0	1,375,311	13,753
24	2015-16	1,375,311	55,012	0	0	1,430,324	14,303
25	2016-17	1,430,324	57,213	0	0	1,487,537	14,875
26	2017-18	1,487,537	59,501	0	0	1,547,038	15,470
27	2018-19	1,547,038	61,882	0	0	1,608,920	16,089
28	2019-20	1,608,920	64,357	0	0	1,673,276	16,733
29	2020-21	1,673,276	66,931	0	0	1,740,208	17,402
30	2021-22	1,740,208	69,608	0	0	1,809,816	18,098

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$153,855

TABLE 5. TAX INCREMENT PROJECTIONS: H STREET BUSINESS COALITION ALTERNATIVE

Year	Fiscal Year	Assessed Valuation Previous FY	Forecast Increase at 2%	Added by Sale or New Construction	Adj. for Prior Value or Demolition	Assessed Valuation Current FY	Incremental Assessed Value	Estimated Tax Increment	County Share	Annual Revenue to Chula Vista
(4)	1987-88					3,148,443				
(3)	1988-89	3,148,443	62,969	0	0	3,211,412	62,969	630	0	630
(2)	1989-90	3,211,412	64,228	0	0	3,275,640	127,197	1,272	0	1,272
(1)	1990-91	3,275,640	65,513	0	0	3,341,153	192,710	1,927	0	1,927
0	1991-92	3,341,153	66,823	2,141,145	(1,137,520)	4,411,601	1,263,158	12,632	0	12,632
1	1992-93	4,411,601	88,232	3,015,328	(2,183,968)	5,331,193	2,182,750	21,827	0	21,827
2	1993-94	5,331,193	106,624	0	(1,181,091)	4,256,726	1,108,283	11,083	0	11,083
3	1994-95	4,256,726	85,135	0	(599,033)	3,742,827	594,384	5,944	0	5,944
4	1995-96	3,742,827	74,857	0	0	3,817,684	669,241	6,692	0	6,692
5	1996-97	3,817,684	76,354	9,078,200	0	12,972,238	9,823,795	98,238	0	98,238
6	1997-98	12,972,238	259,445	0	0	13,231,682	10,083,239	100,832	0	100,832
7	1998-99	13,231,682	264,634	0	(655,608)	12,840,708	9,692,265	96,923	0	96,923
8	1999-2000	12,840,708	256,814	0	0	13,097,523	9,949,080	99,491	0	99,491
9	2000-01	13,097,523	261,950	15,445,900	0	28,805,373	25,656,930	256,569	0	256,569
10	2001-02	28,805,373	576,107	0	0	29,381,480	26,233,037	262,330	0	262,330
11	2002-03	29,381,480	587,630	0	0	29,969,110	26,820,667	268,207	0	268,207
12	2003-04	29,969,110	599,382	0	0	30,568,492	27,420,049	274,200	0	274,200
13	2004-05	30,568,492	611,370	0	0	31,179,862	28,031,419	280,314	0	280,314
14	2005-06	31,179,862	623,597	0	0	31,803,459	28,655,016	286,550	0	286,550
15	2006-07	31,803,459	636,069	0	0	32,439,529	29,291,086	292,911	0	292,911
16	2007-08	32,439,529	648,791	0	0	33,088,319	29,939,876	299,399	0	299,399
17	2008-09	33,088,319	661,766	0	0	33,750,085	30,601,642	306,016	0	306,016
18	2009-10	33,750,085	675,002	0	0	34,425,087	31,276,644	312,766	0	312,766
19	2010-11	34,425,087	688,502	0	0	35,113,589	31,965,146	319,651	0	319,651
20	2011-12	35,113,589	702,272	0	0	35,815,861	32,667,418	326,674	0	326,674
21	2012-13	35,815,861	716,317	0	0	36,532,178	33,383,735	333,837	0	333,837
22	2013-14	36,532,178	730,644	0	0	37,262,821	34,114,378	341,144	45,202	295,942
23	2014-15	37,262,821	745,256	0	0	38,008,078	34,859,635	348,596	46,189	302,407
24	2015-16	38,008,078	760,162	0	0	38,768,239	35,619,796	356,198	47,196	309,002
25	2016-17	38,768,239	775,365	0	0	39,543,604	36,395,161	363,952	48,224	315,728
26	2017-18	39,543,604	790,872	0	0	40,334,476	37,186,033	371,860	49,271	322,589
27	2018-19	40,334,476	806,690	0	0	41,141,166	37,992,723	379,927	50,340	329,587
28	2019-20	41,141,166	822,823	0	0	41,963,989	38,815,546	388,155	51,431	336,725
29	2020-21	41,963,989	839,280	0	0	42,803,269	39,654,826	396,548	52,543	344,006
30	2021-22	42,803,269	856,065	0	0	43,659,334	40,510,891	405,109	53,677	351,432

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$1,645,501

TABLE 6. SALES TAX PROJECTIONS: H STREET BUSINESS COALITION ALTERNATIVE

Year	Fiscal Year	Taxable Sales Previous FY	Forecast Increase at 4%	Sales Added by New Outlets	Reduced for Discontinued Outlets	Taxable Sales Current FY	Sales Tax Revenues to City at 1%
(1)	1990-91					3,150,000	
0	1991-92	3,150,000	126,000	0	0	3,276,000	32,760
1	1992-93	3,276,000	131,040	0	0	3,407,040	34,070
2	1993-94	3,407,040	136,282	0	0	3,543,322	35,433
3	1994-95	3,543,322	141,733	0	(2,515,196)	1,169,859	11,699
4	1995-96	1,169,859	46,794	0	0	1,216,653	12,167
5	1996-97	1,216,653	48,666	678,892	0	1,944,211	19,442
6	1997-98	1,944,211	77,768	0	0	2,021,980	20,220
7	1998-99	2,021,980	80,879	0	(1,368,569)	734,290	7,343
8	1999-2000	734,290	29,372	0	0	763,662	7,637
9	2000-01	763,662	30,546	725,889	0	1,520,097	15,201
10	2001-02	1,520,097	60,804	0	0	1,580,901	15,809
11	2002-03	1,580,901	63,236	0	0	1,644,137	16,441
12	2003-04	1,644,137	65,765	0	0	1,709,902	17,099
13	2004-05	1,709,902	68,396	0	0	1,778,299	17,783
14	2005-06	1,778,299	71,132	0	0	1,849,430	18,494
15	2006-07	1,849,430	73,977	0	0	1,923,408	19,234
16	2007-08	1,923,408	76,936	0	0	2,000,344	20,003
17	2008-09	2,000,344	80,014	0	0	2,080,358	20,804
18	2009-10	2,080,358	83,214	0	0	2,163,572	21,636
19	2010-11	2,163,572	86,543	0	0	2,250,115	22,501
20	2011-12	2,250,115	90,005	0	0	2,340,120	23,401
21	2012-13	2,340,120	93,605	0	0	2,433,724	24,337
22	2013-14	2,433,724	97,349	0	0	2,531,073	25,311
23	2014-15	2,531,073	101,243	0	0	2,632,316	26,323
24	2015-16	2,632,316	105,293	0	0	2,737,609	27,376
25	2016-17	2,737,609	109,504	0	0	2,847,113	28,471
26	2017-18	2,847,113	113,885	0	0	2,960,998	29,610
27	2018-19	2,960,998	118,440	0	0	3,079,438	30,794
28	2019-20	3,079,438	123,178	0	0	3,202,615	32,026
29	2020-21	3,202,615	128,105	0	0	3,330,720	33,307
30	2021-22	3,330,720	133,229	0	0	3,463,949	34,639

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$232,502

- o Construction cost is assumed to be \$10,966,547 (= 124,990 sq. ft. x \$75/sq. ft. x escalation at 4% for 4 years).
- o Average taxable retail sales is assumed to be \$180 per square foot for retail areas and \$1,000,000 for Arby's.
- o If a community facility such as a roller skating rink is included, then financial assistance from the city may be required (Mike Jacobs, pers. comm.).

Two scenarios were examined: One with share of new sales at 60% (i.e., 40% of sales are diverted from other stores in the City) and another with share of new sales at 30% (i.e., 70% of sales are diverted).

Based on the above, the discounted values of tax increment and sales tax revenues would be \$1,667,200 and \$1,105,400, assuming 60% new sales (Tables 7 and 8). If the share of new sales is 30%, the discounted value of sales tax revenues would decline to \$596,100 (see summary in Table 9).

Franchise and Utility Users Taxes

Proposed Project

The existing hospital uses approximately 4.5 million kilowatt-hours (KWh) of electricity per year. This represents an average consumption of 34,000 KWh per occupied bed per year, or 42.8 KWh per square foot of building.

The proposed project consists of additional beds; support facilities, such as laboratories and administration; and medical offices. Estimates of future consumption are based on the following:

- o Additional beds would use 34,000 KWh per occupied bed.

TABLE 7. TAX INCREMENT PROJECTIONS: RETAIL AND ENTERTAINMENT ALTERNATIVE

Year	Fiscal Year	Assessed Valuation Previous FY	Forecast Increase at 2%	Added by Sale or New Construction	Adj. for Prior Value or Demolition	Assessed Valuation Current FY	Incremental Assessed Value	Estimated Tax Increment	County Share	Annual Revenue to Chula Vista
(4)	1987-88					3,148,443				
(3)	1988-89	3,148,443	62,969	0	0	3,211,412	62,969	630	0	630
(2)	1989-90	3,211,412	64,228	0	0	3,275,640	127,197	1,272	0	1,272
(1)	1990-91	3,275,640	65,513	0	0	3,341,153	192,710	1,927	0	1,927
0	1991-92	3,341,153	66,823	2,141,145	(1,137,520)	4,411,601	1,263,158	12,632	0	12,632
1	1992-93	4,411,601	88,232	0	0	4,499,833	1,351,390	13,514	0	13,514
2	1993-94	4,499,833	89,997	8,817,463	(2,227,647)	11,179,645	8,031,202	80,312	0	80,312
3	1994-95	11,179,645	223,593	0	(2,409,426)	8,993,812	5,845,369	58,454	0	58,454
4	1995-96	8,993,812	179,876	10,966,547	0	20,140,235	16,991,792	169,918	0	169,918
5	1996-97	20,140,235	402,805	0	0	20,543,040	17,394,597	173,946	0	173,946
6	1997-98	20,543,040	410,861	0	0	20,953,901	17,805,458	178,055	0	178,055
7	1998-99	20,953,901	419,078	0	0	21,372,979	18,224,536	182,245	0	182,245
8	1999-2000	21,372,979	427,460	0	0	21,800,438	18,651,995	186,520	0	186,520
9	2000-01	21,800,438	436,009	0	0	22,236,447	19,088,004	190,880	0	190,880
10	2001-02	22,236,447	444,729	0	0	22,681,176	19,532,733	195,327	0	195,327
11	2002-03	22,681,176	453,624	0	0	23,134,799	19,986,356	199,864	0	199,864
12	2003-04	23,134,799	462,696	0	0	23,597,495	20,449,052	204,491	0	204,491
13	2004-05	23,597,495	471,950	0	0	24,069,445	20,921,002	209,210	0	209,210
14	2005-06	24,069,445	481,389	0	0	24,550,834	21,402,391	214,024	0	214,024
15	2006-07	24,550,834	491,017	0	0	25,041,851	21,893,408	218,934	0	218,934
16	2007-08	25,041,851	500,837	0	0	25,542,688	22,394,245	223,942	0	223,942
17	2008-09	25,542,688	510,854	0	0	26,053,542	22,905,099	229,051	0	229,051
18	2009-10	26,053,542	521,071	0	0	26,574,613	23,426,170	234,262	0	234,262
19	2010-11	26,574,613	531,492	0	0	27,106,105	23,957,662	239,577	0	239,577
20	2011-12	27,106,105	542,122	0	0	27,648,227	24,499,784	244,998	0	244,998
21	2012-13	27,648,227	552,965	0	0	28,201,191	25,052,748	250,527	0	250,527
22	2013-14	28,201,191	564,024	0	0	28,765,215	25,616,772	256,168	33,942	222,225
23	2014-15	28,765,215	575,304	0	0	29,340,520	26,192,077	261,921	34,705	227,216
24	2015-16	29,340,520	586,810	0	0	29,927,330	26,778,887	267,789	35,482	232,307
25	2016-17	29,927,330	598,547	0	0	30,525,877	27,377,434	273,774	36,275	237,499
26	2017-18	30,525,877	610,518	0	0	31,136,394	27,987,951	279,880	37,084	242,795
27	2018-19	31,136,394	622,728	0	0	31,759,122	28,610,679	286,107	37,909	248,198
28	2019-20	31,759,122	635,182	0	0	32,394,304	29,245,861	292,459	38,751	253,708
29	2020-21	32,394,304	647,886	0	0	33,042,190	29,893,747	298,937	39,609	259,328
30	2021-22	33,042,190	660,844	0	0	33,703,034	30,554,591	305,546	40,485	265,061

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$1,667,191

TABLE 8. SALES TAX PROJECTIONS: RETAIL AND ENTERTAINMENT ALTERNATIVE (60% NEW SALES)

Year	Fiscal Year	Taxable Sales Previous FY	Forecast Increase at 4%	Sales Added by New Outlets	Reduced for Discontinued Outlets	Taxable Sales Current FY	Sales Tax Revenues to City at 1%
(1)	1990-91					3,150,000	
0	1991-92	3,150,000	126,000	0	0	3,276,000	32,760
1	1992-93	3,276,000	131,040	0	0	3,407,040	34,070
2	1993-94	3,407,040	136,282	0	0	3,543,322	35,433
3	1994-95	3,543,322	141,733	0	(3,685,054)	0	0
4	1995-96	0	0	9,322,141	0	9,322,141	93,221
5	1996-97	9,322,141	372,886	0	0	9,695,026	96,950
6	1997-98	9,695,026	387,801	0	0	10,082,827	100,828
7	1998-99	10,082,827	403,313	0	0	10,486,140	104,861
8	1999-2000	10,486,140	419,446	0	0	10,905,586	109,056
9	2000-01	10,905,586	436,223	0	0	11,341,809	113,418
10	2001-02	11,341,809	453,672	0	0	11,795,482	117,955
11	2002-03	11,795,482	471,819	0	0	12,267,301	122,673
12	2003-04	12,267,301	490,692	0	0	12,757,993	127,580
13	2004-05	12,757,993	510,320	0	0	13,268,313	132,683
14	2005-06	13,268,313	530,733	0	0	13,799,045	137,990
15	2006-07	13,799,045	551,962	0	0	14,351,007	143,510
16	2007-08	14,351,007	574,040	0	0	14,925,047	149,250
17	2008-09	14,925,047	597,002	0	0	15,522,049	155,220
18	2009-10	15,522,049	620,882	0	0	16,142,931	161,429
19	2010-11	16,142,931	645,717	0	0	16,788,648	167,886
20	2011-12	16,788,648	671,546	0	0	17,460,194	174,602
21	2012-13	17,460,194	698,408	0	0	18,158,602	181,586
22	2013-14	18,158,602	726,344	0	0	18,884,946	188,849
23	2014-15	18,884,946	755,398	0	0	19,640,344	196,403
24	2015-16	19,640,344	785,614	0	0	20,425,958	204,260
25	2016-17	20,425,958	817,038	0	0	21,242,996	212,430
26	2017-18	21,242,996	849,720	0	0	22,092,716	220,927
27	2018-19	22,092,716	883,709	0	0	22,976,425	229,764
28	2019-20	22,976,425	919,057	0	0	23,895,482	238,955
29	2020-21	23,895,482	955,819	0	0	24,851,301	248,513
30	2021-22	24,851,301	994,052	0	0	25,845,353	258,454
Present Value (1991-92 to 2021-22) at 8.5% Discount Rate							<u>\$1,105,379</u>

TABLE 9. SALES TAX PROJECTIONS: RETAIL AND ENTERTAINMENT ALTERNATIVE (30% NEW SALES)

Year	Fiscal Year	Taxable Sales Previous FY	Forecast Increase at 4%	Sales Added by New Outlets	Reduced for Discontinued Outlets	Taxable Sales Current FY	Sales Tax Revenues to City at 1%
(1)	1990-91					3,150,000	
0	1991-92	3,150,000	126,000	0	0	3,276,000	32,760
1	1992-93	3,276,000	131,040	0	0	3,407,040	34,070
2	1993-94	3,407,040	136,282	0	0	3,543,322	35,433
3	1994-95	3,543,322	141,733	0	(3,685,054)	0	0
4	1995-96	0	0	4,661,070	0	4,661,070	46,611
5	1996-97	4,661,070	186,443	0	0	4,847,513	48,475
6	1997-98	4,847,513	193,901	0	0	5,041,414	50,414
7	1998-99	5,041,414	201,657	0	0	5,243,070	52,431
8	1999-2000	5,243,070	209,723	0	0	5,452,793	54,528
9	2000-01	5,452,793	218,112	0	0	5,670,905	56,709
10	2001-02	5,670,905	226,836	0	0	5,897,741	58,977
11	2002-03	5,897,741	235,910	0	0	6,133,650	61,337
12	2003-04	6,133,650	245,346	0	0	6,378,997	63,790
13	2004-05	6,378,997	255,160	0	0	6,634,156	66,342
14	2005-06	6,634,156	265,366	0	0	6,899,523	68,995
15	2006-07	6,899,523	275,981	0	0	7,175,504	71,755
16	2007-08	7,175,504	287,020	0	0	7,462,524	74,625
17	2008-09	7,462,524	298,501	0	0	7,761,025	77,610
18	2009-10	7,761,025	310,441	0	0	8,071,466	80,715
19	2010-11	8,071,466	322,859	0	0	8,394,324	83,943
20	2011-12	8,394,324	335,773	0	0	8,730,097	87,301
21	2012-13	8,730,097	349,204	0	0	9,079,301	90,793
22	2013-14	9,079,301	363,172	0	0	9,442,473	94,425
23	2014-15	9,442,473	377,699	0	0	9,820,172	98,202
24	2015-16	9,820,172	392,807	0	0	10,212,979	102,130
25	2016-17	10,212,979	408,519	0	0	10,621,498	106,215
26	2017-18	10,621,498	424,860	0	0	11,046,358	110,464
27	2018-19	11,046,358	441,854	0	0	11,488,212	114,882
28	2019-20	11,488,212	459,528	0	0	11,947,741	119,477
29	2020-21	11,947,741	477,910	0	0	12,425,650	124,257
30	2021-22	12,425,650	497,026	0	0	12,922,676	129,227

Present Value (1991-92 to 2021-22) at 8.5% Discount Rate \$596,127

- o Support space would use electricity at 80% of the rate for the existing hospital, or 34.2 KWh per square foot.
- o Medical office would use the same amount of electricity as hospital support space, or 34.2 KWh per square foot.

Estimated increase in the consumption of electricity over the existing is 6.3 million KWh per year at Phase 1 and 17.1 million KWh per year at the ultimate phase (Table 10). Based on the current tax rate of \$0.0025 per KWh, the additional utility users tax revenue to Chula Vista is \$15,800 at Phase 1 and \$42,800 at the ultimate phase.

The City also levies a franchise tax on electric consumption at a rate of 1.1% of gross charges. Assuming a weighted electric rate of 5.5¢ per KWh, additional franchise tax revenue to the City is \$3,800 at Phase 1 and \$10,300 at the ultimate phase.

The existing hospital uses approximately 97,000 therms of gas per year, representing an average of 730 therms per occupied bed, or 0.92 therms per square foot of building.

Estimates of future consumption are based on the following:

- o Additional beds would use 730 therms per bed.
- o Support space would use gas at 10% of the rate for the existing hospital, or 0.092 therms per square foot.
- o Medical office would use the same amount of gas as hospital support space, or 0.092 therms per square foot.

Estimated increase in the consumption of gas over the existing is 68,000 therms per year at Phase 1 and 96,000 therms per year at the ultimate phase (Table 11). Based on the current tax

TABLE 10. ELECTRIC CONSUMPTION: PROPOSED PROJECT

Phase 1

Hospital beds: $289 \text{ beds} \times 73.4\% \text{ occupancy} \times 34,000 \text{ KWh} = 7.2 \text{ million KWh/yr.}$

Support space: $45,000 \text{ sq.ft.} \times 34.2 \text{ KWh} = 1.5 \text{ million KWh/yr.}$

Medical office: $62,180 \text{ sq.ft.} \times 34.2 \text{ KWh} = 2.1 \text{ million KWh/yr.}$

Total: $7.2 + 1.5 + 2.1 = 10.8 \text{ million KWh/yr.}$

Change from existing: $10.8 - 4.5 = 6.3 \text{ million KWh/yr.}$

Ultimate Phase

Hospital beds: $7.2 \text{ million KWh/yr.}$

Support space: $(45,000 + 251,790 \text{ sq.ft}) \times 34.2 \text{ KWh} = 10.1 \text{ million KWh/yr.}$

Medical office: $(62,180 + 62,240 \text{ sq.ft.}) \times 34.2 \text{ KWh} = 4.3 \text{ million KWh/yr.}$

Total: $7.2 + 10.1 + 4.3 = 21.6 \text{ million KWh/yr.}$

Change from existing: $21.6 - 4.5 = 17.1 \text{ million KWh/yr.}$

TABLE 11. GAS CONSUMPTION: PROPOSED PROJECT

Phase 1

Hospital beds: $289 \text{ beds} \times 73.4\% \text{ occupancy} \times 730 \text{ therms} = 155,000 \text{ therms/yr.}$

Support space: $45,000 \text{ sq.ft.} \times 0.092 \text{ therms} = 4,000 \text{ therms/yr.}$

Medical office: $62,180 \text{ sq.ft.} \times 0.092 \text{ therms} = 6,000 \text{ therms/yr.}$

Total: $155,000 + 4,000 + 6,000 = 165,000 \text{ therms/yr.}$

Change from existing: $165,000 - 97,000 = 68,000 \text{ therms/yr.}$

Ultimate Phase

Hospital beds: $155,000 \text{ therms/yr.}$

Support space: $(45,000 + 251,790 \text{ sq.ft.}) \times 0.092 \text{ therms} = 27,000 \text{ therms/yr.}$

Medical office: $(62,180 + 62,240 \text{ sq.ft.}) \times 0.092 \text{ therms} = 11,000 \text{ therms/yr.}$

Total: $155,000 + 27,000 + 11,000 = 193,000 \text{ therms/yr.}$

Change from existing: $193,000 - 97,000 = 96,000 \text{ therms/yr.}$

rate of \$0.00919 per therm, the additional utility users tax revenue to the City is \$600 at Phase 1 and \$900 at ultimate.

The franchise tax on gas consumption is 2% of gross charges. Gas prices for the project area are approximately \$1,900 for the first 3,000 therms per month and \$0.405 per therm thereafter. (These are based on a weighted average using a ratio of summer to winter monthly consumption of 38:62). Increases in franchise tax revenues to the City are then \$600 per year at Phase 1 and \$800 per year at ultimate.

Utility users tax is also levied on the use of the telephone, at the rate of 5% of gross charges. Assuming an average telephone bill of \$40 per employee per month and new employment of 341 persons at Phase 1 and 481 persons at the ultimate phase, the estimated increases in tax revenues are \$8,200 and \$11,500 per year at Phase 1 and ultimate.

In total, the proposed project is anticipated to generate \$29,000 and \$66,300 in additional utility users and franchise taxes at Phase 1 and the ultimate phase. The present value of these revenues is \$511,800, based on 8.5% discount rate and projected revenues to FY 2021-22.

H Street Business Coalition Alternative

The three buildings which are proposed to be retained on project site total 10,700 square feet. Previous fiscal analyses conducted for Chula Vista assume utility usage rates of 15 KWh of electricity per square foot and 0.75 therms of gas per square foot. For telephone usage, it will be assumed here that charges are \$20 per employee. By implication, estimated utility users taxes paid by the three establishments are \$400 for electricity, \$70 for gas, and \$320 for telephone, for a total of \$790. Franchise taxes are \$100 for electricity and \$80 for gas. Together, these uses generate \$970 per year (Table 12).

Under this alternative, this revenue would be collected for the additional time that the uses remain on site.

**TABLE 12. ELECTRICITY, GAS AND TELEPHONE: H STREET BUSINESS
COALITION ALTERNATIVE**

Electricity: 10,700 sq.ft. x 15 KWh = 160,500 KWh/yr.

Utility users tax: 160,500 KWh x 0.0025 = \$400/yr.

Franchise tax: 160,500 KWh x \$0.055 x 1.1% = \$100/yr.

Gas: 10,700 sq.ft. x 0.75 therms = 8,000 therms/yr.

Utility users tax: 8,000 therms x 0.00919 = \$70/yr.

Franchise tax: (\$1,900 + [8,000 - 3,000 therms] x \$0.405) x 2% = \$80/yr.

Telephone tax: 27 emp. x \$20 x 12 mos. x 5% = \$320/yr.

TOTAL TAXES: 400 + 100 + 70 + 80 + 320 = \$970/yr.

Retail and Entertainment Alternative

Based on the same rates of utility usage as above (15 KWh and 0.75 therms per square foot), the proposed 124,990 square foot center would use 1.9 million KWh of electricity and 93,700 therms of gas per year. The estimated utility users and franchise taxes for this alternative are \$6,400 and \$1,700, for a total of \$8,100 per year (Table 13).

TABLE 13. ELECTRICITY, GAS AND TELEPHONE: RETAIL AND ENTERTAINMENT ALTERNATIVE

Electricity: $124,990 \text{ sq.ft.} \times 15 \text{ KWh} = 1,875,000 \text{ KWh/yr.}$

Utility users tax: $1,875,000 \text{ KWh} \times 0.0025 = \$4,700/\text{yr.}$

Franchise tax: $1,875,000 \text{ KWh} \times \$0.055 \times 1.1\% = \$1,100/\text{yr.}$

Gas: $124,990 \text{ sq.ft.} \times 0.75 \text{ therms} = 93,700 \text{ therms}$

Utility users tax: $93,700 \text{ therms} \times 0.00919 = \$900/\text{yr.}$

Franchise tax: $(\$1,900 + [93,700 - 3,000 \text{ therms}] \times \$0.405) \times 2\% = \$800/\text{yr.}$

Telephone tax: $53 \text{ emp.} \times \$20 \times 12 \text{ mos.} \times 5\% = \$600/\text{yr.}$

TOTAL TAXES: $4,700 + 1,100 + 900 + 800 + 600 = \$8,100/\text{yr.}$

APPENDIX H

CALIFORNIA DEPARTMENT OF WATER RESOURCES
WATER CONSERVATION RECOMMENDATIONS

Department of Water Resources Recommendations
for Water Conservation and Water Reclamation

To reduce water demand, implement the water conservation measures described here.

Required

The following State laws require water-efficient plumbing fixtures in structures:

- o Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings as follows:

"After January 1, 1983, all new buildings constructed in this state shall use water closets and associated flushometer valves, if any, which are water-conservation water closets as defined by American National Standards Institute Standard A112.19.2, and urinals and associated flushometer valves, if any, that use less than an average of 1-1/2 gallons per flush. Blowout water closets and associated flushometer valves are exempt from the requirements of this section."
- o Title 20, California Administrative Code Section 1604(f) (Appliance Efficiency Standards) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, and sink faucets, as specified in the standard approved by the American National Standards Institute on November 16, 1979, and known as ANSI A112.18.1M-1979.
- o Title 20, California Administrative Code Section 1606(b) (Appliance Efficiency Standards) prohibits the sale of fixtures that do not comply with regulations. No new appliance may be sold or offered for sale in California that is not certified by its manufacturer to be in compliance with the provisions of the regulations establishing applicable efficiency standards.
- o Title 24 of the California Administrative Code Section 2-5307(b) (California Energy Conservation Standards for New Buildings) prohibits the installation of fixtures unless the manufacturer has certified to the CEC compliance with the flow rate standards.
- o Title 24, California Administrative Code Sections 2-5352(i) and (j) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. These requirements apply to steam and steam-condensate return piping and recirculating hot water piping in attics, garages, crawl spaces, or unheated spaces other than between floors or in interior walls. Insulation of water-heating systems is also required.

- o Health and Safety Code Section 4047 prohibits installation of residential water softening or conditioning appliances unless certain conditions are satisfied. Included is the requirement that, in most instances, the installation of the appliance must be accompanied by water conservation devices on fixtures using softened or conditioned water.
- o Government Code Section 7800 specifies that lavatories in all public facilities constructed after January 1, 1985, be equipped with self-closing faucets that limit flow of hot water.

Recommendations to be implemented where applicable

Interior:

1. Supply line pressure: Water pressure greater than 50 pounds per square inch (psi) be reduced to 50 psi or less by means of a pressure-reducing valve.
2. Drinking fountains: Drinking fountains be equipped with self-closing valves.
3. Hotel rooms: Conservation reminders be posted in rooms and restrooms.* Thermostatically controlled mixing valve be installed for bath/shower.
4. Laundry facilities: Water-conserving models of washers be used.
5. Restaurants: Water-conserving models of dishwashers be used or spray emitters that have been retrofitted for reduced flow. Drinking water be served upon request only.*
6. Ultra-low-flush toilets: 1-1/2-gallon per flush toilets be installed in all new construction.

Exterior:*

1. Landscape with low water-using plants wherever feasible.
2. Minimize use of lawn by limiting it to lawn-dependent uses, such as playing fields. When lawn is used, require warm season grasses.
3. Group plants of similar water use to reduce overirrigation of low-water-using plants.
4. Provide information to occupants regarding benefits of low-water-using landscaping and sources of additional assistance.

*The Department of Water Resources or local water district may aid in developing these materials or providing other information.

5. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
6. Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation.
7. Install efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Drip irrigation, soil moisture sensors, and automatic irrigation systems are a few methods of increasing irrigation efficiency.
8. Use pervious paving material whenever feasible to reduce surface water runoff and to aid in ground water recharge.
9. Grade slopes so that runoff of surface water is minimized.
10. Investigate the feasibility of using reclaimed waste water, stored rainwater, or grey water for irrigation.
11. Encourage cluster development, which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge.
12. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This aids ground water recharge.
13. To aid in ground water recharge, preserve flood plains and aquifer recharge areas as open space.

Department of Water Resources
Recommendations for
Flood Damage Prevention

In flood-prone areas, flood damage prevention measures required to protect a proposed development should be based on the following guidelines:

1. It is the State's policy to conserve water; any potential loss to ground water should be mitigated.
2. All building structures should be protected against a 100-year flood.
3. In those areas not covered by a Flood Insurance Rate Map or Flood Boundary and Floodway Map, issued by the Federal Emergency Management Agency, the 100-year flood elevation and boundary should be shown in the Environmental Impact Report.
4. At least one route of ingress and egress to the development should be available during a 100-year flood.
5. The slope and foundation designs for all structures should be based on detailed soils and engineering studies, especially for hillside developments.
6. Revegetation of disturbed or newly constructed slopes should be done as soon as possible (utilizing native or low-water-using plant material).
7. The potential damage to the proposed development by mudflow should be assessed and mitigated as required.
8. Grading should be limited to dry months to minimize problems associated with sediment transport during construction.